

CHATTANOOGA-HAMILTON COUNTY
AIR POLLUTION CONTROL BOARD
2018 COE Petition

Attachment – Grant Reports



Chattanooga-Hamilton County Air Pollution Control Bureau

December 29, 2017

Gwendolyn G. Graf
Grants Management and Strategic Planning
Air, Pesticides and Toxics Management Division
61 Forsyth Street, SW
Atlanta, GA 30303-8960

Subject: Performance Evaluation For FY 2017 105 Grant Commitments

Dear Ms. Graf:

The following is an evaluation of performance of the 105 FY 2017 Air Planning Agreement for the Chattanooga-Hamilton County Air Pollution Control Bureau (the Bureau). We trust that this will satisfy the year-end reporting requirement regarding this matter. This is a two-year report of a three year continuation grant reporting period.

Improving Air Quality

NAAQS Cross Cutting

The local Chattanooga-Hamilton County Air Pollution Control Program continued all activities as set forth in the Air Planning Agreement. Air Monitoring Data consistently shows continued attainment. There were no "Special Projects" undertaken or required during this grant period. The EPA mid-year evaluation showed that the Bureau is meeting the required grant conditions.

Implement Mobile Source Programs

The local Bureau actively participated in the transportation conformity process. This included consulting with appropriate transportation and air quality partners on developing and finalizing of motor vehicle emissions budgets, participating in the interagency consultation process through State and Local monthly conference calls, developing relationships with transportation partners, developing and updating the transportation conformity SIPs and consultation procedures as required by the Clean Air Act. This is an ongoing activity.

Implement NSR Programs

No NSR/PSD permits were issued during the FY 17 grant reporting period. However, the Bureau did review all modifications of major source permits to determine applicability when and if such action was or is required.

Ambient Air Monitoring

All SOP updates have been submitted to EPA SEDS and have been approved except for an SOP for a T640. The SOP for the T640 has been submitted but has not yet been approved.

All SLAMS data entries were made and confirmed, as required to meet submittal deadlines.

More than 75% of the data was recovered on all monitors.

Air monitoring personnel attended the Region 4 Ambient Monitoring Workshop and the National Air Monitoring Conference.

Exceptional event data is flagged when an event is identified and EPA is also notified.

The local Bureau submitted a Network Review to the State that was incorporated in the 2016 State Monitoring Plan.

A QMP revision was submitted to EPA in November of 2017 and is not yet approved.

The Bureau submitted a new QAPP to the EPA in November of 2015. EPA returned it for revisions in 2016. It is in final revision at the local agency and will be submitted to EPA in early 2018.

No new pollutants were monitored in FY 2017.

Revisions for all SOPs were submitted to SEDS and all revisions were approved except for the T640 which was submitted but is not yet approved.

All applicable monitoring data is/has been reported to *AirNow* as required.

The Bureau complies with 40 CFR Section 50.14 regarding flagging exceptional event data.

Data completeness requirements were fully met.

Reduce Air Toxics

The Bureau continues to implement Major and Area Source National Emission Standards for Hazardous Air Pollutants. The Bureau also continues to regulate sources that emit air toxics under local regulations. Currently, there are no Section 111(d) or Section 129 sources located in Chattanooga-Hamilton County pursuant to 40 CFR 60.25 (e) and (t).

No air toxics monitoring was performed.

Monitoring and Enforcement

The Bureau completed all grant commitments as required.

The Bureau committed to and did inspect 25% and more of all NESHAP asbestos demolition/renovation projects. The actual inspection rate for FY 2017 was 65% of all NESHAP asbestos demolition/renovation projects. All required reports were submitted.

Cross Cutting Issues

The Bureau completed all grant commitments as required.

Emission Inventories – Hazardous Air Pollutants. The Bureau maintains an emissions inventory for hazardous air pollutants (HAP's) and submits HAP emissions to the National Emissions Inventory (NEI).

Emission Inventories – Criteria Air Pollutants. The Bureau maintains an emissions inventory for criteria air pollutants (CAP's) and submits CAP emissions to the National Emissions Inventory (NEI).

Planning

The draft Air Planning Agreement for FY 2017 was submitted as required.

There are no un-liquidated obligations. All funds applicable to the given budget period were expended in accordance with the grant commitments.

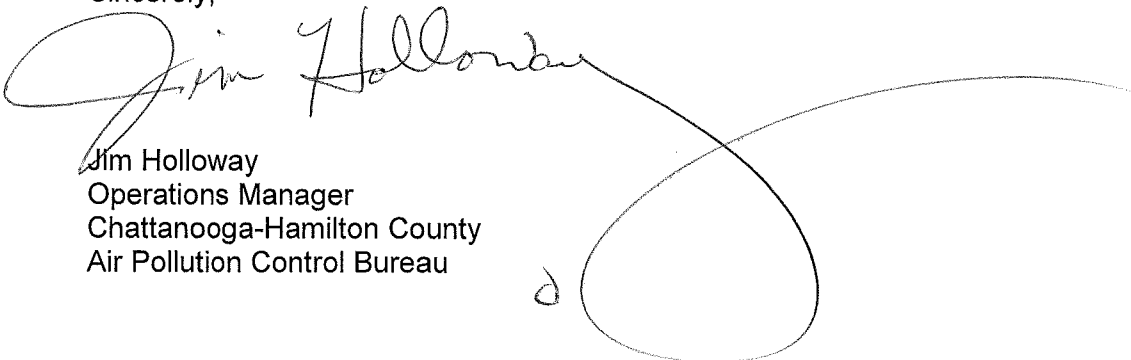
It is this Agency's expectation to get increased Federal funding in the upcoming Federal budget year to match the ever increasing grant requirements (workloads) and the equally increasing associated expenses thereof.

The work accomplished here is as was proposed in the approved FY 2017 Air Planning Agreement. We believe that with the accomplishments of these objectives, we are meeting the Chattanooga-Hamilton County Air Pollution Control Bureau goals.

However, we see this as an ongoing process. With continued vigilance, we will continue providing clean air for the citizens of Chattanooga and Hamilton County.

If you have any questions, please contact me at (423) 643-5979 or by email at jholloway@chattanooga.gov.

Sincerely,

A large, stylized handwritten signature in black ink, appearing to read "Jim Holloway". The signature is written over a large, empty oval shape that is part of the document's layout.

Jim Holloway
Operations Manager
Chattanooga-Hamilton County
Air Pollution Control Bureau

FEDERAL FINANCIAL REPORT

(Follow form instructions)

1. Federal Agency and Organizational Element to Which Report is Submitted United States Environmental Protection Agency		2. Federal Grant or Other Identifying Number Assigned by Federal Agency (To report multiple grants, use FFR Attachment) <div style="text-align: center; font-size: 1.2em; font-weight: bold;">A - 00408415 - 7</div>			Page <div style="border: 1px solid black; width: 20px; height: 20px; display: flex; align-items: center; justify-content: center;">1</div> of <div style="border: 1px solid black; width: 20px; height: 20px; display: flex; align-items: center; justify-content: center;">1</div>		
3. Recipient Organization (Name and complete address including Zip code) Chattanooga - Hamilton County Air Pollution Control Bureau 6125 Preservation Drive, Suite 140, Chattanooga, TN 37416							
4a. DUNS Number 1374695520000	4b. EIN 62 - 6000259	5. Recipient Account Number or Identifying Number (To report multiple grants, use FFR Attachment) Grant Number: A - 00408415 - 7		6. Report Type <input type="checkbox"/> Semi-Annual <input checked="" type="checkbox"/> Annual <input type="checkbox"/> Final	7. Basis of Accounting Cash XAccrual		
8. Project/Grant Period From: (Month, Day, Year) 10/1/2014		To: (Month, Day, Year) 9/30/2018		9. Reporting Period End Date (Month, Day, Year) 9/30/2017			
10. Transactions (Use lines a-c for single or multiple grant reporting)					Cumulative		
Federal Cash: (To report multiple grants, also use FFR Attachment):							
a. Cash Receipts							
b. Cash Disbursements							
c. Cash on Hand (line a minus b)							
(Use lines d-o for single grant reporting)							
Federal Expenditures and Unobligated Balance:							
d. Total Federal funds authorized					\$1,104,058.00		
e. Federal share of expenditures					\$1,104,058.00		
f. Federal share of unliquidated obligations							
g. Total Federal share (sum of lines e and f)							
h. Unobligated balance of Federal funds (line d minus g)					\$1,104,058.00		
Recipient Share:							
i. Total recipient share required					\$833,595.00		
j. Recipient share of expenditures					\$833,595.00		
k. Remaining recipient share to be provided (line i minus j)							
Program Income:							
l. Total Federal program income earned					\$ - 0 -		
m. Program income expended in accordance with the deduction alternative							
n. Program income expended in accordance with the addition alternative							
o. Unexpended program income (line l minus line m or line n)							
11. Indirect Expense	a. Type	b. Rate	c. Period From	Period To	d. Base	e. Amount Charged	f. Federal Share
g. Totals:							
12. Remarks: Attach any explanations deemed necessary or information required by Federal sponsoring agency in compliance with governing legislation:							
The cumulative CEL/MOE for three years of this continuation grant is \$833,595.00. In the fourth year of this continuation grant, the recipient will provide no less than \$277,865.00.							
13. Certification: By signing this report, I certify that it is true, complete, and accurate to the best of my knowledge. I am aware that any false, fictitious, or fraudulent information may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 18, Section 1001)							
a. Typed or Printed Name and Title of Authorized Certifying Official <div style="text-align: center;">Jim Holloway, Operations Manager</div>					c. Telephone (Area code, number and extension) (423) 643 - 5979		
b. Signature of Authorized Certifying Official 					d. Email address jholloway@chattanooga.gov		
					e. Date Report Submitted (Month, Day, Year) 12/29/2017		
					14. Agency use only: Federal Share Calculation: 58.98%		

Standard Form 425
 OMB Approval Number: 0348-0061
 Expiration Date: 02/28/2015

Paperwork Burden Statement

According to the Paperwork Reduction Act, as amended, no persons are required to respond to a collection of information unless it displays a valid OMB Control Number. The valid OMB control number for this information collection is 0348-0061. Public reporting burden for this collection of information is estimated to average 1.5 hours per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0060), Washington, DC 20503.

(Follow form instructions)

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Region 4 - Air Planning Agreement For Fiscal Year 2017 ** Draft **

**Agency: Chattanooga-Hamilton County Air Pollution Control Bureau
View Portions of the Workplan**

Improving Air Quality*

Goal: 1: Addressing Climate Change and Improving Air Quality

Objective: 1.2: Improve Air Quality. Achieve and maintain health- and welfare-based air pollution standards and reduce risk from toxic air pollutants and indoor air contaminants.

Sub-Objective: Reduce Criteria Pollutants and Regional Haze

- Strategic Targets:**
- By 2018, the population-weighted average concentrations of ozone (smog) in all monitored counties will decrease to 0.072 ppm compared to the average of 0.076 ppm in 2011, a reduction of 5 percent.
 - By 2018, the population-weighted average concentrations of inhalable fine particles in all monitored counties will decrease to 9.5 $\mu\text{g}/\text{m}^3$ compared to the average of 10.4 $\mu\text{g}/\text{m}^3$ in 2011, a reduction of 9 percent.
 - Through 2018, maintain emissions of sulfur dioxide (SO₂) from electric power generation sources to 5.0 million tons per year compared to the 2009 level of 5.7 million tons emitted. (In 2011, these sources emitted 4.5 million tons.)
 - By 2018, visibility in scenic parks and wilderness areas will improve by 15 percent in the East and 5 percent in the West, on the 20 percent worst visibility days, as compared to visibility on the 20 percent worst days during the 2000-2004 baseline.
 - By 2018, with EPA support including training, policy, and administrative and technical assistance, tribes will receive 15 additional approvals to implement the Clean Air Act in Indian country (as demonstrated by successful completion of an eligibility determination under the Tribal Authority Rule). The cumulative total will be 62 approved eligibility determinations, from the 2012 baseline of 47.
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* Information from EPA's 2014-2018 Strategic Plan at (<http://www2.epa.gov/planandbudget/strategicplan>).

FY 2017 105 Grant Commitments:

NAAQS Cross Cutting

1. Continue to develop and implement standards, plans, strategies, and actions to preserve air quality in attainment areas and prevent further degradation in areas with the potential to be designated nonattainment in the future. Continue screening of monitoring data for early indication of nonattainment. For areas that violate after the designation, work with Region 4 to develop a plan to expeditiously bring each area back into attainment.

Response: Yes

2. Consistent with the national allocation of section 105 grant resources and the states' and locals' voluntary withholding of 105 grant resources for special projects, continue developing regional planning capabilities for National Ambient Air Quality Standards (NAAQS) and regional haze, including emission inventory development, building air quality modeling capacity, other technical analyses and collaboration

with other agencies. The state and local contact or section chief in the Air Regulatory Management Section should be notified, at the mid-year point and a month prior to the end of the grant period, via e-mail of how the state or local agency is meeting this grant condition, specifying applicable specific grants or programs.

Response: Yes. Will follow the state's lead in this matter. Will cooperate with the state as might be required.

Implement Mobile Source Programs

3. Actively participate in the transportation conformity process, which includes the following activities: consult with appropriate transportation and air quality partners on development of motor vehicle emissions budgets; participate in the interagency consultation process; and develop relationships with transportation partners.

Response: Yes

Implement NSR Programs

4. Issue major NSR/Prevention of Significant Deterioration (PSD) permits and minor source permits that comply with CAA requirements and enter Best Achievable Control Technology (BACT)/Lowest Achievable Emissions Rate (LAER) determinations for major sources in the Reasonably Achievable Control Technology (RACT)/BACT/LAER Clearinghouse (RBLC).

Response: Yes

5. Upon receipt of an NSR/PSD permit application for a major source, submit a copy to EPA. If your agency has a completeness determination process, notify EPA when each NSR/PSD permit application is deemed complete. Upon public notice of a draft NSR/PSD permit for a major new source of modification, submit a copy to EPA of any documents relevant to the preliminary determination and draft NSR/PSD permit. Upon issuance of a final major source permit, submit a copy to EPA of any documents relevant to the final determination and final permit.

Response: Yes

Ambient Air Monitoring

6. Operate all criteria pollutant monitors and perform requisite data review and quality assurance/quality control elements in compliance with the requirements of the CFR and other applicable federal policy and guidance. This commitment includes all reporting and data certification requirements (e.g., annual State and Local Air Monitoring Station (SLAMS) reports and data certifications due by May 1 each year).

Response: Yes

7. The agency will collect strip chart data or its electronic equivalent for quality assurance purposes. Electronic strip chart data must be collected on a 1 minute timeframe or less. This data must be retained for a minimum of three (3) complete monitoring years.

Response: Yes

8. The State will develop and submit for approval a statewide ambient monitoring network plan. The network plan should be consistent with requirements outlined in 40 CFR Parts 50, 53, and 58. Local agencies will coordinate with the State in the development of this plan. The annual network plan is to be submitted on or by July 1 of each year incorporating any changes, real or proposed. Include in the annual ambient monitoring network design plan a certified evaluation of the agency's ambient monitors and auxiliary support equipment and categorize the condition of the equipment as "Good," "Fair," or "Poor." Please indicate which equipment pieces are not in everyday use (e.g., spare/back-up equipment stored in

a lab or warehouse). Auxiliary equipment includes items such as calibrators, data loggers, meteorological equipment, modems, etc. The agency is requested to replace equipment categorized as "Poor."

Response: Yes

9. Maintain an approved quality management plan (QMP) for activities involving the collection and use of air quality environmental data. The QMP will be submitted at least 60 days prior to the expiration of the current QMP and address EPA Requirements for Quality Management Plans (EPA QA/R-2, <http://www.epa.gov/quality/qs-docs/r2-final.pdf>). For additional information and guidance see <http://www.epa.gov/quality/qmps.html>.

Response: Yes

10. For all new pollutants to be monitored and methods to be used during the fiscal year, submit a quality assurance project plan three months prior to collection of environmental data.

Response: Yes

11. State and local agencies will review and update their quality assurance project plans (QAPPs) for their respective criteria pollutant networks, as appropriate, and submit modifications to EPA prior to modifying their networks. All QAPPs should be reviewed annually, revised if necessary and any revisions must be submitted to the Science and Ecosystems Support Division (SESD) for review and approval. All QAPPs must be revised and submitted for approval at least every 5 years.

Response: Yes. Submitted QAPP to EPA in 2015. It was returned to the Local Agency for revision. It is currently being revised for re-submittal to the EPA.

12. Review and update quality assurance procedures (QAPPs and SOPs), if needed, to reflect current/revised Federal quality assurance requirements. If revisions to SOPs are anticipated, submit them as they are completed. If new monitoring and ancillary equipment is used in the SLAMS network, submit SOPs for that equipment within six months of installation. New and revised SOPs are to be submitted electronically to r4sesdairqa@epa.gov or in hard copy to EPA Region 4's Science and Ecosystems Support Division (SESD), Superfund and Air Section, 980 College Station Road, Athens, Georgia 30605.

Response: Yes, as personnel allows.

13. For all SLAMS and special purpose monitors (SPMs) meeting the requirements of 40 CFR 58, notify EPA as soon as possible, but no later than 30 days, after the determination of exceedances/violations of the NAAQS for all criteria pollutants, including PM_{2.5}. For the 8 hour ozone NAAQS, report all 4th maximum concentrations that are at or above the level of the standard (agencies meet this commitment for monitors whose data are reported to AIRNow).

Response: Yes. Data is reported to AIRNow.

14. Comply with the requirements in 40 CFR Section 50.14 regarding treatment of data influenced by exceptional events. (Note: EPA Region 4 will neither review nor concur on either state or local requests to exclude data unless the state is in compliance with the appropriate requirements.)

Response: Yes

15. In conjunction with the AQI, agencies are encouraged to submit an air quality forecast for MSA's greater than 350,000 people to the EPA AIRNow Web site. The air quality forecast should be submitted daily to the AIRNow web site before 3:55 p.m. EDT. The air quality forecast, like the AQI, will be based on the primary criteria pollutant. Unlike the AQI, an index value is not required to be reported as a forecast; instead of the index value, the AQI descriptor value of Good, Moderate, Unhealthy for Sensitive Groups, Unhealthy, or Very Unhealthy should be used.

Response: The State of Tennessee forecasts for Chattanooga - Hamilton County.

16. Support staff participation at the following meetings:
A. The Region 4 Ambient Air Monitoring Work Shop; and
B. The National Ambient Air Monitoring Conference.

Response: Yes, as personnel and funding are available.

17. SLAMS data for each criteria pollutant monitor must be at a minimum 75% complete on a quarterly and annual basis. Additionally, ozone data must be 90% or more complete on a three year average basis. Notify EPA immediately if a problem arises that will prevent the agency from meeting a data

completeness requirement for any pollutant. Provide reasons why the data completeness requirement will not be met, a schedule for correcting the problem, and corrective actions that will be taken to avert the problem from recurring. Notify EPA by mail or e-mail no more than 90 days after the end of the quarter of any monitor not meeting the 75% data recovery requirement. Data recovery may become part of a regional/national statistical report published by EPA.

Response: Yes

Reduce Air Toxics*

Goal: 1: Addressing Climate Change and Improving Air Quality

Objective: 1.2: Improve Air Quality. Achieve and maintain health- and welfare-based air pollution standards and reduce risk from toxic air pollutants and indoor air contaminants.

Sub-Objective: Reduce Air Toxics

Strategic Targets:

- Through 2018, maintain air toxics (toxicity-weighted for cancer) emissions reductions to 4.2 million tons from the 1993 toxicity-weighted baseline of 7.2 million tons.
-

* Information from EPA's 2014-2018 Strategic Plan at (<http://www2.epa.gov/planandbudget/strategicplan>).

FY 2017 105 Grant Commitments:

1. Collect ambient air quality data for toxics from monitoring sites as appropriate for special studies funded under this agreement. Include any planned air toxics monitoring in the ambient monitoring network design plan that is submitted to EPA in July annually. If no monitoring is planned, respond to this commitment by stating, "No air toxics monitoring will be performed."

Response: No air toxics monitoring will be performed.

2. Review and update quality assurance procedures (QAPPs and SOPs), if needed, to reflect current/revised Federal quality assurance requirements. Submit QAPPs for review and approval electronically to r4sesdairqa@epa.gov or in hard copy to EPA Region 4's Science and Ecosystems Support Division (SESD), Superfund and Air Section, 980 College Station Road, Athens, Georgia 30605. Submit air toxics SOPs with the QAPPs; however, SOPs will not be reviewed and approved by EPA. QAPPs and SOPs should be incorporated into the agency's quality management plan (QMP). If no monitoring is planned respond to this commitment by stating, "No air toxics monitoring will be performed."

Response: No air toxics monitoring will be performed.

3. If applicable, encourage laboratories conducting analyses for air toxics to participate in any available national or regional inter-laboratory proficiency testing programs and audits and make identified modifications to enhance data quality.

Response: Not Applicable.

4. If applicable, enter quality assured and associated QA/QC data into the AQS database system no later than 120 days from the end of the quarter for all ambient air toxics monitoring data collected.

Response: Not Applicable.

5. Assume delegation and implementation of all promulgated Clean Air Act Section 112, 111, and 129 rules and standards [National Emission Standard for Hazardous Air Pollutant (NESHAP), and New Source Performance Standards (NSPS)] within 9 to 12 months of EPA's promulgation, as appropriate, if a rulemaking is required to take delegation via the Agency's CAA Title V approval process. Notify Region 4 by submitting rule adoption documentation within 60 days of adoption.

Response: Yes. Will adopt new and changed NESHAPS, MACT Standards, Residual Risk Rules, Area Source Standards and NSPS as funding and staffing permits.

6. Work towards establishing the programmatic expertise to address the risk-based components of Clean Air Act sections 112, 111, and 129, by pursuing risk training when appropriate.

Response: Yes. The Bureau has an on-going training program.

7. Make case-by-case MACT determinations for all applicable sources under CAA, section 112(g) including appropriate compliance monitoring measures, and copy EPA Region 4 on all final 112(g) determinations.

Response: Yes

8. Maintain a record of all approved alternatives to monitoring, testing, recordkeeping, and reporting requirements made for sources subject to MACT standards and provide copies of approvals to the Region upon issuance (see 40 CFR Part 63.91(g)(1)(ii)).

Response: Yes

9. Prepare and submit CAA sections 111(d) and 129 state plans and letters of certification in accordance with regulatory timeframes. In addition, collect and submit reports on progress of sections 111(d) and 129 plans annually, pursuant to 40 CFR 60.25(e) and (f).

Response: Yes. Will adopt rules if any such source(s) locates in this jurisdiction.

Monitoring and Enforcement*

Goal: 5: Protecting Human Health and the Environment by Enforcing Laws and Assuring Compliance

Objective: 5.1: Enforce Environmental Laws to Achieve Compliance. Pursue vigorous civil and criminal enforcement that targets the most serious water, air, and chemical hazards in communities to achieve compliance. Assure strong, consistent, and effective enforcement of federal environmental laws nationwide. Use Next Generation Compliance strategies and tools to improve compliance and reduce pollution.

Sub-Objective: Support Addressing Climate Change and Improving Air Quality

Strategic Targets:

- By 2018, reduce, treat, or eliminate 1,590 million estimated pounds of air pollutants as a result of concluded enforcement actions (5-year cumulative). (FY 2005-2008 baseline: 480 million pounds, annual average over the period. Status for FY 2013: 610 million pounds.)
-

* Information from EPA's 2014-2018 Strategic Plan at (<http://www2.epa.gov/planandbudget/strategicplan>).

FY 2017 105 Grant Commitments:

1. Ensure enforcement and compliance monitoring is consistent with the Compliance Monitoring Strategy Policy revised and reissued on July 14, 2014, The Timely and Appropriate Enforcement Response to High Priority Violations Policy revised and reissued on August 25, 2014. Ensure complete, accurate and timely data support of the Integrated Compliance Information System (ICIS-Air).
Response: Yes
2. Resolve violations of any rule for which EPA has delegated authority to the state or local agency. Federally Reportable Violations should be reported to ICIS-Air in accordance with the Guidance on Federally-Reportable Violations for Clean Air Act Stationary Sources revised and reissued on September 23, 2014.
Response: Yes
3. Inspect 25% of all NESHAP asbestos demolition/renovation projects. These projects should be selected so that all removal contractors are inspected at least once. Alternatively, lower inspection rates can be negotiated if an effective contractor certification program is in place. Lower inspection rates can also be negotiated if a non-notifier strategy is developed and implemented.
Response: Yes. Will inspect at least 25% of all NESHAP asbestos demolition/renovation projects.
4. Observe asbestos work practices in progress whenever possible to assess compliance. Special priority will be given to entering a project of a contractor with a work practice violation within the previous 12-month period.
Response: We will request the assistance of EPA Region 4 if the Bureau Director deems it necessary to enter the containment area to evaluate compliance.
5. ACTS/NARS database is no longer available. Report the following asbestos NESHAP activities at least forty-five (45) days after each fiscal **six-month period** 1) number of notifications received; 2) number of inspections; 3) non-notifier activity if applicable; 4) number of non-penalty enforcement actions; 5) number of enforcement actions with an assessed penalty; and 6) total penalty assessment.

Response: Yes

6. Maintain a State/Local health and safety plan for asbestos demolition/renovation inspectors. Plan to include medical monitoring, protective equipment, and training as minimum requirements. Alternatively, implement EPA's "Health and Safety Guidelines for EPA Asbestos Inspectors," dated March 1991. These documents will be reviewed by EPA during state program visits.

Response: Yes. Health evaluations are available at the City Wellness Center as provided for Inspectors.

7. Recommend (where appropriate) cases and provide support to the EPA Criminal Enforcement Program.

Response: Yes

Cross Cutting Issues

Goal: 1 and 5: Addressing Climate Change and Improving Air Quality, and Protecting Human Health and the Environment by Enforcing Laws and Assuring Compliance

Objective: See all objectives listed in this agreement.

Sub-Objective: See all strategic targets listed in this agreement.

Strategic Targets: • See all strategic targets listed in this agreement.

FY 2017 105 Grant Commitments:

Emission Inventories - Hazardous Air Pollutants

1. Review the National Air Toxic Assessment (NATA) results during the year the EPA Office of Air Quality Planning and Standards (OAQPS) requests it and make revisions to your agency's inventory. Support the Emission Inventory System (EIS) in reporting the 2011 National Emissions Inventory (NEI) for hazardous air pollutants. The EPA requests that state, local, and tribal air agencies submit emissions information updates for major point sources to EIS database annually or as requested by OAQPS. Information on the EIS Gateway can be found at: <http://www.epa.gov/ttn/chief/eis/gateway/index.html>. The state and local NEI/NATA contact in the Air Data and Analysis Section should be notified via e-mail when the 2014 submittal is made to the EIS.

Response: Yes. Will continue to submit all available HAPs.

Emission Inventories - Criteria Air Pollutants

2. Develop and submit to EPA, emissions inventory information for all applicable point sources, criteria air pollutants (CAP) and time frames consistent with the Air Emissions Reporting Requirements (AERR) Rule published in the December 17, 2008; 73 Federal Register 76539 and any clarifying or updated policy. The 2015 CAPs point source emissions inventories should be submitted to EPA Headquarters through the Emissions Inventory System (EIS) Gateway no later than January 13, 2017. Early submittals are recommended. Information on the EIS Gateway can be found at: <http://www.epa.gov/ttn/chief/eis/gateway/index.html>. Notify the state and local NEI/NATA contact in the Air Data and Analysis Section via email when the 2015 submittal is made to the EIS.

Response: Yes

Planning

3. Submit a draft Air Planning Agreement for FY 2017 by August 1, 2016, respectively, by responding to the commitments on the internet-based draft workplan.

Response: Yes

4. Participate with EPA in an end of year evaluation of performance to be completed by February 15, 2018. This evaluation will be based on an annual summary report submitted by the agency by December 31, and on progress reports received throughout the year. In accordance with 40 CFR 35.115 and the EPA Policy on Managing Unliquidated Obligations and Ensuring Progress under EPA Assistance Agreements, the joint evaluation process will include:
- A. discussions of accomplishments as measured against work plan commitments;
 - B. discussions of the cumulative effectiveness of the work performed under all work plan components;
 - C. discussions of existing and potential problem areas;
 - D. suggestions for improvement, including, where feasible, schedules for making improvements; and
 - E. discussions of how effectively grant funds were managed and utilized, taking into account any accumulation of unliquidated obligations.

Response: Yes

Agency Expectations of EPA (optional)

5. Enter Agency's expectations of EPA (i.e., assistance needed from EPA to meet the commitments under this Air Planning Agreement)

Response: Additional funding to employ additional manpower is requested to better meet the numerous program requirements in the face of increasing workloads and costs.

Return to Air Planning Agreement Program

Semiannual Title V Permit Data Report

This information request is authorized pursuant to the Information Collection Request for Part 70 Operating Permit Regulations, EPA Number 1587.06, OMB Number 2060-0243; April 2004.

Permitting Authority:	Chattanooga-Hamilton County Air Pollution Control Bureau	
Report Date:	January 31, 2018	
Reporting Period:	<input type="checkbox"/> January 01 – June 30, *Report due July 31*	<input checked="" type="checkbox"/> July 01 – December 31, 2017 *Report due January 31*

Data Element	Reported Value	Information
1. Outstanding Permit Issuance	a) Number of final actions: not applicable	<ul style="list-style-type: none"> Total final actions on Permitting Authority-specific permit issuance commitments (i.e., agreements by the Permitting Authority to complete action on initial permits within a specified time-frame, such as agreements related to the 2001 citizen comments). If the Permitting Authority does not have a commitment, enter "not applicable" in 1(a) and 1(b).
	b) Total commitment universe: not applicable	
	c) Date commitment completed (if applicable):	
2. Total Current Part 70 Source Universe and Permit Universe	a) Number of active part 70 <u>sources</u> that have obtained part 70 permits, plus the number of active part 70 <u>sources</u> that have not yet obtained part 70 permits: 13	<ul style="list-style-type: none"> The total current part 70 <u>source</u> universe includes all sources subject to the Permitting Authority's part 70 program applicability requirements (i.e., provisions comparable to §70.3). In 2.a), count all active sources that either have obtained or will obtain a part 70 permit. EPA expects that this data will be primarily based on the Permitting Authority's application and permit tracking information. If, however, the Permitting Authority is aware of part 70 sources that are not yet captured by application or permit information, count those sources as well. Do <u>not</u> count sources that are no longer subject to part 70, such as sources that have shut down, or become natural minors or synthetic minors, and do not have an active part 70 permit. Do <u>not</u> double count sources included in 2.b).

Total Current Part 70 Source Universe and Permit Universe (Continued)	b) Number of part 70 <u>sources</u> that have applied to obtain a synthetic minor restriction in lieu of a part 70 permit, and the part 70 program's permit application due dates for those sources have passed: 0	<ul style="list-style-type: none"> Element 2.b) is intended to capture the universe of part 70 sources that are seeking synthetic minor restrictions in lieu of part 70 permits, but haven't received those restrictions before becoming subject to the part 70 program's permit application requirements. If the part 70 applications don't readily identify sources seeking such restrictions, the Permitting Authority may include those sources in 2.a), and need not break them out here. However, EPA expects Permitting Authorities to consider pending synthetic minor requests <u>not</u> addressed in part 70 applications to calculate this portion of the part 70 source universe. Count sources that currently meet the part 70 program's applicability requirements, their part 70 application due dates have passed, and they have requested but not yet received synthetic minor restrictions in lieu of a part 70 permit (or permit renewal). Also count active sources whose synthetic minor restrictions have expired (i.e., no synthetic minor restrictions are currently in place, even though they may be eligible for such restrictions) and are past their part 70 program's application due date. Do <u>not</u> count sources that have active synthetic minor restrictions and are no longer subject to part 70. Do <u>not</u> double count sources included in 2(a).
	c) Total number of current part 70 <u>sources</u> (a+b): 13	
	d) <i>For permitting authorities that issue multiple part 70 permits to a single source:</i> total number of active part 70 <u>permits</u> issued, plus part 70 <u>permits</u> applied for: not applicable	<ul style="list-style-type: none"> For Permitting Authorities that issue multiple part 70 permits to a single source, and these permits are issued and tracked separately, report the total permit universe, including # of active part 70 permits issued (element 3 below), plus permits applied for (based on pending applications). This information is for correlating data when the Permitting Authority's part 70 <u>permit</u> universe may be greater than the part 70 <u>source</u> universe. For Permitting Authorities that do not issue multiple permits to a single source, or for those that issue and track multiple permits issued to a source on a source-wide basis, enter "not applicable" in 2.d).

3. Total Active Part 70 Permits	<p>Total number of active part 70 permits:</p> <p>11</p>	<ul style="list-style-type: none"> • This element includes all <u>active</u> initial and renewal part 70 permits issued by the permitting authority. Do <u>not</u> count inactive permits, i.e., permits that are no longer in effect due to source shutdown, synthetic minor restrictions, etc. Note: the procedures for rendering part 70 permits no longer effective may vary, depending on the part 70 program. • Do <u>not</u> count both initial and renewal permits (or prior renewal and current renewal permits) issued to the same source; i.e., do not double count. • Count permits that have been extended (see 6.b. below), but do <u>not</u> count permits that have expired, or have been voided, revoked, etc. • Count each source covered by a general permit separately for this data element. If a single source has several general permits and/or source specific permits, refer to the information for permitting authorities that issue multiple part 70 permits to a single source. • For permitting authorities that issue multiple part 70 permits to a single source and included information in element 2(d), count each permitted portion of the source separately for this element. This distinction is for correlating this data element with the permit universe information in element #2(d).
4. Timeliness of Initial Permits (PART element)	<p>a) Total number of initial part 70 permits issued during 6 month reporting period:</p> <p>0</p>	<ul style="list-style-type: none"> • This data element tracks the initial part 70 permits issued as final (e.g., not draft or proposed) during the 6 month reporting period covered by this report, and whether they were issued within 18 months of receipt of an administratively complete application. • For TOPS purposes, initial permits are permits that are issued to any source that has become subject to part 70 for the first time, or any source that comes back into the part 70 program after a period of not being subject. • If no initial permits were issued during the 6 month reporting period, report "zero" in 4(b), and "not applicable" in 4(a). • Start the 18-month clock on the submittal date of an administratively complete application. For purposes of this data element, do not stop or restart the 18 month clock for additional information submitted after the application is deemed administratively complete. • For permitting authorities that issue multiple part 70 permits to a single source and included information in 2(d), count each permitted portion of the source separately for this element. This distinction is for determining individual permit timeliness.
	<p>b) Number of initial part 70 permits finalized during 6 month reporting period that were issued within 18 months:</p> <p>not applicable</p>	

5. Total Outstanding Initial Part 70 Applications	<p>The number of active initial part 70 applications older than 18 months:</p> <p>2</p>	<ul style="list-style-type: none"> • This element tracks <u>all</u> active, administratively complete <u>initial</u> part 70 permit applications that the permitting authority has not taken final action on within 18 months of receipt of the administratively complete application. Do not stop or restart the 18 month clock for additional information submitted after the application is deemed administratively complete. • For TOPS purposes, initial part 70 applications are applications for sources that are subject to title V for the first time, or for any source that comes back into the title V program after a period of not being subject. Do <u>not</u> include renewal applications. • Include all current outstanding initial applications, including those that may also be tracked in data element #1. • Do <u>not</u> count initial applications the Permitting Authority has taken final action on.
6. Outstanding Renewal Permit Actions	<p>a) Total number of expired permits for active part 70 sources:</p> <p>0</p>	<ul style="list-style-type: none"> • This data element tracks the total number of expired permits for active part 70 sources. Part 70 permits expire after 5 years if the sources do not submit timely and complete renewal applications, or if they have lost their application shield by not timely responding to additional requests for information. • Include expired permits that have been addressed through consent orders or other enforcement mechanisms. Expired permits can be further addressed in the "Additional Information" element. • Do <u>not</u> include permits that have expired because the source is no longer subject to Title V; i.e., they have shutdown or have received synthetic minor restrictions. <p>For permitting authorities that issue multiple part 70 permits to a single source and included information in 2(d), count each expired permit separately.</p>

Outstanding Renewal Permit Actions	b) Total number of active permits with terms extended past 5 years:	<ul style="list-style-type: none"> • This data element tracks the total number of active permits that have been extended past the original 5 year permit term. Part 70 permits or permit conditions are extended beyond the original 5 year term when sources submit a timely and complete renewal application (and any timely and complete additional information requested by the permitting authority), but the permitting authority has not yet issued a renewal permit. • Count all extended permits, including extended permits for sources that submitted timely and complete renewal applications within the last 18 months. Pending applications that are less than 18 months old can be further addressed in the "Additional Information" element. • Do <u>not</u> include inactive extended permits, i.e., when a subsequent permit renewal has been issued or a source is no longer subject to part 70. • Do <u>not</u> include "expired part 70 permits" that have been addressed through consent orders or other enforcement mechanisms. Count expired permits in 6(a). • For permitting authorities that issue multiple part 70 permits to a single source and included information in 2(d), count each extended permit separately.
(Continued)	2	

7. Timeliness of Significant Modifications (PART element - a and b only)	a) Total number of significant modifications issued during 6 month reporting period: 0	<ul style="list-style-type: none"> • This data element tracks the number of significant modifications issued as final (e.g., not draft or proposed) during the 6 month reporting period. It also tracks the number of those modifications that were issued within 18 months of receipt of an administratively complete significant modification application, and also the number that were issued within 9 months. Note that 7(c) is a subset of 7(b). • If no significant modifications were issued during the 6 month reporting period, report "zero" in 7(a) and "not applicable" in 7(b) and 7(c). • Start the application clock on the submittal date of an administratively complete significant modification application. Do not restart the clock for additional information submissions.
	b) Number of significant modifications finalized during 6 month reporting period that were issued within 18 months: not applicable	
	c) Number of significant modifications finalized during 6 month reporting period that were issued within 9 months: not applicable	
8. Outstanding Significant Permit Modifications	Total number of active significant modification applications older than 18 months: 0	<ul style="list-style-type: none"> • This element tracks all active, administratively complete significant permit modification applications that the permitting authority has not taken final action on within 18 months of receipt of the administratively complete application. • Do not stop or restart the 18 month clock for additional information submitted after the application is deemed administratively complete. • Do <u>not</u> count significant modification applications the Permitting Authority has taken final action on.
9. Comments and Additional Information	Two synthetic minor sources each submitted a complete initial Part 70 permit application in December 2013, as required by 40 CFR 63 Subpart VVVVVV. Neither source has yet been issued a Part 70 permit. The two sources with extended Part 70 permits submitted complete renewal Part 70 permit applications in March 2014 and October 2014, respectively.	Permitting authorities may provide any additional information in this section. For example, a permitting authority may address data changes, data management issues, general permits, multiple permits issued to single stationary sources, synthetic minor information, additional relevant data, etc.

Semiannual Title V Permit Data Report

This information request is authorized pursuant to the Information Collection Request for Part 70 Operating Permit Regulations, EPA Number 1587.06, OMB Number 2060-0243; April 2004.

Permitting Authority:	Chattanooga-Hamilton County Air Pollution Control Bureau	
Report Date:	August 15, 2017	
Reporting Period:	<input checked="" type="checkbox"/> January 01 – June 30, 2017 *Report due July 31*	<input type="checkbox"/> July 01 – December 31, *Report due January 31*

Data Element	Reported Value	Information
1. Outstanding Permit Issuance	a) Number of final actions: not applicable b) Total commitment universe: not applicable c) Date commitment completed (if applicable):	<ul style="list-style-type: none"> Total final actions on Permitting Authority-specific permit issuance commitments (i.e., agreements by the Permitting Authority to complete action on initial permits within a specified time-frame, such as agreements related to the 2001 citizen comments). If the Permitting Authority does not have a commitment, enter "not applicable" in 1(a) and 1(b).
2. Total Current Part 70 Source Universe and Permit Universe	a) Number of active part 70 <u>sources</u> that have obtained part 70 permits, plus the number of active part 70 <u>sources</u> that have not yet obtained part 70 permits: 14	<ul style="list-style-type: none"> The total current part 70 <u>source</u> universe includes all sources subject to the Permitting Authority's part 70 program applicability requirements (i.e., provisions comparable to §70.3). In 2.a), count all active sources that either have obtained or will obtain a part 70 permit. EPA expects that this data will be primarily based on the Permitting Authority's application and permit tracking information. If, however, the Permitting Authority is aware of part 70 sources that are not yet captured by application or permit information, count those sources as well. Do <u>not</u> count sources that are no longer subject to part 70, such as sources that have shut down, or become natural minors or synthetic minors, and do not have an active part 70 permit. Do <u>not</u> double count sources included in 2.b).

Total Current Part 70 Source Universe and Permit Universe (Continued)	b) Number of part 70 <u>sources</u> that have applied to obtain a synthetic minor restriction in lieu of a part 70 permit, and the part 70 program's permit application due dates for those sources have passed: 0	<ul style="list-style-type: none"> Element 2.b) is intended to capture the universe of part 70 sources that are seeking synthetic minor restrictions in lieu of part 70 permits, but haven't received those restrictions before becoming subject to the part 70 program's permit application requirements. If the part 70 applications don't readily identify sources seeking such restrictions, the Permitting Authority may include those sources in 2.a), and need not break them out here. However, EPA expects Permitting Authorities to consider pending synthetic minor requests <u>not</u> addressed in part 70 applications to calculate this portion of the part 70 source universe. Count sources that currently meet the part 70 program's applicability requirements, their part 70 application due dates have passed, and they have requested but not yet received synthetic minor restrictions in lieu of a part 70 permit (or permit renewal). Also count active sources whose synthetic minor restrictions have expired (i.e., no synthetic minor restrictions are currently in place, even though they may be eligible for such restrictions) and are past their part 70 program's application due date. Do <u>not</u> count sources that have active synthetic minor restrictions and are no longer subject to part 70. Do <u>not</u> double count sources included in 2(a).
	c) Total number of current part 70 <u>sources</u> (a+b): 14	
	d) <i>For permitting authorities that issue multiple part 70 permits to a single source:</i> total number of active part 70 <u>permits</u> issued, plus part 70 <u>permits</u> applied for: not applicable	<ul style="list-style-type: none"> For Permitting Authorities that issue multiple part 70 permits to a single source, and these permits are issued and tracked separately, report the total permit universe, including # of active part 70 permits issued (element 3 below), plus permits applied for (based on pending applications). This information is for correlating data when the Permitting Authority's part 70 permit universe may be greater than the part 70 <u>source</u> universe. For Permitting Authorities that do not issue multiple permits to a single source, or for those that issue and track multiple permits issued to a source on a source-wide basis, enter "not applicable" in 2.d).

3. Total Active Part 70 Permits	Total number of active part 70 permits: 12	<ul style="list-style-type: none"> • This element includes all <u>active</u> initial and renewal part 70 permits issued by the permitting authority. Do <u>not</u> count inactive permits, i.e., permits that are no longer in effect due to source shutdown, synthetic minor restrictions, etc. Note: the procedures for rendering part 70 permits no longer effective may vary, depending on the part 70 program. • Do <u>not</u> count both initial and renewal permits (or prior renewal and current renewal permits) issued to the same source; i.e., do not double count. • Count permits that have been extended (see 6.b. below), but do <u>not</u> count permits that have expired, or have been voided, revoked, etc. • Count each source covered by a general permit separately for this data element. If a single source has several general permits and/or source specific permits, refer to the information for permitting authorities that issue multiple part 70 permits to a single source. • For permitting authorities that issue multiple part 70 permits to a single source and included information in element 2(d), count each permitted portion of the source separately for this element. This distinction is for correlating this data element with the permit universe information in element #2(d).
4. Timeliness of Initial Permits (PART element)	a) Total number of initial part 70 permits issued during 6 month reporting period: 0	<ul style="list-style-type: none"> • This data element tracks the initial part 70 permits issued as final (e.g., not draft or proposed) during the 6 month reporting period covered by this report, and whether they were issued within 18 months of receipt of an administratively complete application. • For TOPS purposes, initial permits are permits that are issued to any source that has become subject to part 70 for the first time, or any source that comes back into the part 70 program after a period of not being subject. • If no initial permits were issued during the 6 month reporting period, report "zero" in 4(b), and "not applicable" in 4(a).
	b) Number of initial part 70 permits finalized during 6 month reporting period that were issued within 18 months: not applicable	<ul style="list-style-type: none"> • Start the 18-month clock on the submittal date of an administratively complete application. For purposes of this data element, do not stop or restart the 18 month clock for additional information submitted after the application is deemed administratively complete. • For permitting authorities that issue multiple part 70 permits to a single source and included information in 2(d), count each permitted portion of the source separately for this element. This distinction is for determining individual permit timeliness.

5. Total Outstanding Initial Part 70 Applications	<p>The number of active initial part 70 applications older than 18 months:</p> <p>2</p>	<ul style="list-style-type: none"> • This element tracks <u>all</u> active, administratively complete <u>initial</u> part 70 permit applications that the permitting authority has not taken final action on within 18 months of receipt of the administratively complete application. Do not stop or restart the 18 month clock for additional information submitted after the application is deemed administratively complete. • For TOPS purposes, initial part 70 applications are applications for sources that are subject to title V for the first time, or for any source that comes back into the title V program after a period of not being subject. Do <u>not</u> include renewal applications. • Include all current outstanding initial applications, including those that may also be tracked in data element #1. • Do <u>not</u> count initial applications the Permitting Authority has taken final action on.
6. Outstanding Renewal Permit Actions	<p>a) Total number of expired permits for active part 70 sources:</p> <p>0</p>	<ul style="list-style-type: none"> • This data element tracks the total number of expired permits for active part 70 sources. Part 70 permits expire after 5 years if the sources do not submit timely and complete renewal applications, or if they have lost their application shield by not timely responding to additional requests for information. • Include expired permits that have been addressed through consent orders or other enforcement mechanisms. Expired permits can be further addressed in the "Additional Information" element. • Do <u>not</u> include permits that have expired because the source is no longer subject to Title V; i.e., they have shutdown or have received synthetic minor restrictions. <p>For permitting authorities that issue multiple part 70 permits to a single source and included information in 2(d), count each expired permit separately.</p>

Outstanding Renewal Permit Actions (Continued)	b) Total number of active permits with terms extended past 5 years: 3	<ul style="list-style-type: none">• This data element tracks the total number of active permits that have been extended past the original 5 year permit term. Part 70 permits or permit conditions are extended beyond the original 5 year term when sources submit a timely and complete renewal application (and any timely and complete additional information requested by the permitting authority), but the permitting authority has not yet issued a renewal permit.• Count all extended permits, including extended permits for sources that submitted timely and complete renewal applications within the last 18 months. Pending applications that are less than 18 months old can be further addressed in the "Additional Information" element.• Do <u>not</u> include inactive extended permits, i.e., when a subsequent permit renewal has been issued or a source is no longer subject to part 70.• Do <u>not</u> include "expired part 70 permits" that have been addressed through consent orders or other enforcement mechanisms. Count expired permits in 6(a).• For permitting authorities that issue multiple part 70 permits to a single source and included information in 2(d), count each extended permit separately.
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7. Timeliness of Significant Modifications (PART element - a and b only)	a) Total number of significant modifications issued during 6 month reporting period: 0	<ul style="list-style-type: none"> This data element tracks the number of significant modifications issued as final (e.g., not draft or proposed) during the 6 month reporting period. It also tracks the number of those modifications that were issued within 18 months of receipt of an administratively complete significant modification application, and also the number that were issued within 9 months. Note that 7(c) is a subset of 7(b). If no significant modifications were issued during the 6 month reporting period, report "zero" in 7(a) and "not applicable" in 7(b) and 7(c). Start the application clock on the submittal date of an administratively complete significant modification application. Do not restart the clock for additional information submissions.
b) Number of significant modifications finalized during 6 month reporting period that were issued within 18 months: not applicable	c) Number of significant modifications finalized during 6 month reporting period that were issued within 9 months: not applicable	
8. Outstanding Significant Permit Modifications	Total number of active significant modification applications older than 18 months: 0	<ul style="list-style-type: none"> This element tracks all active, administratively complete significant permit modification applications that the permitting authority has not taken final action on within 18 months of receipt of the administratively complete application. Do not stop or restart the 18 month clock for additional information submitted after the application is deemed administratively complete. Do <u>not</u> count significant modification applications the Permitting Authority has taken final action on.
9. Comments and Additional Information	Two synthetic minor sources each submitted a complete initial Part 70 permit application in December 2013, as required by 40 CFR 63 Subpart VVVVVV. Neither source has yet been issued a Part 70 permit. The three sources with extended Part 70 permits submitted complete renewal Part 70 permit applications in January 2014, March 2014, and October 2014, respectively.	Permitting authorities may provide any additional information in this section. For example, a permitting authority may address data changes, data management issues, general permits, multiple permits issued to single stationary sources, synthetic minor information, additional relevant data, etc.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4

ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

OCT 21 2016

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CHATTANOOGA/HAMILTON CO.

OCT 26 2016

AIR POLLUTION
CONTROL BUREAU

F
*Air Monitoring
Network*

Ms. Michelle Walker Owenby
Director
Division of Air Pollution Control
Tennessee Department of Environment and Conservation
William R. Snodgrass Tennessee Tower
312 Rosa L. Parks Avenue, 15th Floor
Nashville, Tennessee 37243

Dear Ms. Owenby:

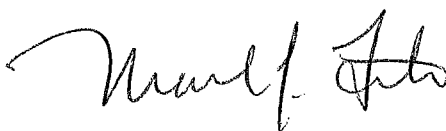
Thank you for submitting the state of Tennessee's 2016 Annual Ambient Air Monitoring Network Plan (Network Plan) dated June 30, 2016. The Network Plan is required by 40 Code of Federal Regulations (CFR) §58.10. The U.S. Environmental Protection Agency Region 4 understands that the Tennessee Department of Environment and Conservation (TDEC) provided the public a 30-day review period and three external comments were received.

With this letter, the EPA approves TDEC's Network Plan with the exception of two aspects. The EPA does not approve the Blountville ozone (O₃) monitor shutdown request or the Clarksville fine particulate matter (PM_{2.5}) monitor relocation request at this time. In prior communication, your office indicated that more detailed shutdown and relocation requests will be submitted to the EPA pursuant to 40 CFR §58.10(b) at a later date. Following completion of the state's public inspection process, an addendum to the Network Plan containing final proposals for these sites must be submitted to the EPA for approval. Additionally, the EPA believes the East Ridge City Hall monitor (AQS# 47-065-0031) operated by the Chattanooga-Hamilton County Air Pollution Control Bureau should be classified as a state and local air monitoring station (SLAMS) monitor rather than a special purpose monitor.

We have enclosed comments on your Network Plan and will continue to work with your agency on the remaining portions of the plan that have not been approved with this letter.

Thank you for working with the EPA to monitor air pollution and promote healthy air quality in Tennessee. Please let us know of any problems in meeting any of the requirements we have identified. If you have any questions or concerns, please contact Gregg Worley at (404) 562-9141 or Sara Waterson at (404) 562-9061.

Sincerely,

for 

Jeaneanne M. Gettle
Acting Director

Air, Pesticides and Toxics Management Division

Internet Address (URL) • <http://www.epa.gov>

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Enclosure

cc: Ms. Lynne A. Liddington, Director
Knox County Air Quality

Mr. Robert Rogers, Technical Manager
Shelby County Health Department Pollution Control Section

Mr. Bob Colby, Director
Chattanooga-Hamilton County Air Pollution Control Bureau

Mr. John Finke, Director
Nashville / Davidson County Metro Public
Health Department Pollution Control Division

CY 2016 State of Tennessee Ambient Air Monitoring Network Plan U.S. EPA Comments and Recommendations

This document contains the U.S. Environmental Protection Agency comments and recommendations on the state of Tennessee's 2016 ambient air monitoring network plan (Network Plan). Ambient air monitoring rules, which include regulatory requirements that address network plans, data certification, and minimum monitoring requirements, among other requirements, are found in 40 CFR Part 58. Minimum monitoring requirements for criteria pollutants are listed in 40 CFR Part 58, Appendix D, including those for ozone (O₃), particulate matter less than 2.5 microns (PM_{2.5}), particulate matter less than 10 microns (PM₁₀), nitrogen dioxide (NO₂), sulfur dioxide (SO₂), carbon monoxide (CO), and lead (Pb).

The minimum monitoring requirements are based on core based statistical area (CBSA) boundaries as defined by the U.S. Office of Management and Budget (OMB), July 1, 2015, population estimates from the U.S. Census Bureau, and historical ambient air monitoring data. Minimum monitoring requirements for O₃, PM_{2.5}, and PM₁₀, only apply to metropolitan statistical areas (MSAs), which are a subset of CBSAs. OMB currently defines 26 CBSAs in the state of Tennessee. These CBSAs and the respective July 1, 2015, population estimates from the U.S. Census Bureau are shown in Table 1.

Table 1: Core Based Statistical Areas and July 1, 2015 Population Estimates

CBSA Name	CBSA Type	Population
Nashville-Davidson-Murfreesboro-Franklin, TN	Metropolitan Statistical Area	1,830,345
Memphis, TN-MS-AR	Metropolitan Statistical Area	1,344,127
Knoxville, TN	Metropolitan Statistical Area	861,424
Chattanooga, TN-GA	Metropolitan Statistical Area	547,776
Kingsport-Bristol-Bristol, TN-VA	Metropolitan Statistical Area	307,120
Clarksville, TN-KY	Metropolitan Statistical Area	281,021
Johnson City, TN	Metropolitan Statistical Area	200,648
Jackson, TN	Metropolitan Statistical Area	129,682
Cleveland, TN	Metropolitan Statistical Area	120,864
Morristown, TN	Metropolitan Statistical Area	116,642
Cookeville, TN	Micropolitan Statistical Area	108,191
Tullahoma-Manchester, TN	Micropolitan Statistical Area	102,048
Sevierville, TN	Micropolitan Statistical Area	95,946
Greeneville, TN	Micropolitan Statistical Area	68,580
Crossville, TN	Micropolitan Statistical Area	58,229
Athens, TN	Micropolitan Statistical Area	52,639
Shelbyville, TN	Micropolitan Statistical Area	47,183
Lawrenceburg, TN	Micropolitan Statistical Area	42,564
McMinnville, TN	Micropolitan Statistical Area	40,435
Dyersburg, TN	Micropolitan Statistical Area	37,893
Union City, TN-KY	Micropolitan Statistical Area	36,877
Newport, TN	Micropolitan Statistical Area	35,162
Martin, TN	Micropolitan Statistical Area	33,960
Dayton, TN	Micropolitan Statistical Area	32,526
Paris, TN	Micropolitan Statistical Area	32,147
Lewisburg, TN	Micropolitan Statistical Area	31,552

Monitoring Network Changes Proposed by TDEC

TDEC's Network Plan identifies proposed changes to the state's ambient air monitoring network. The local agency monitoring programs included in the state Network Plan are those operated by the Chattanooga Hamilton County Air Pollution Control Bureau (Chattanooga), the Metro Public Health Department (Nashville), the Knox County Department of Air Quality Management (Knox), and the Memphis/Shelby County Health Department (Memphis-Shelby). The EPA's rationale for approval or disapproval of specific network changes can be found below in the pollutant sections of this document. Monitors proposed for discontinuation and the EPA's determination are summarized in Table 2.

Table 2: Monitors Proposed for Discontinuation

Agency	AQS ID	Site Name	Pollutant	Type	Comments
TDEC	47-163-2002	Blountville	O ₃	SLAMS	Not approved, Shutdown: TDEC indicated a more detailed shutdown request will be submitted to the EPA at a later date. The EPA will evaluate the shutdown request at that time.
Memphis-Shelby	47-157-0016	Gas Service Center	PM ₁₀	SLAMS	Approved, Shutdown: Memphis-Shelby currently operates three PM ₁₀ monitors in the CBSA. Two PM ₁₀ monitors are required. The highest concentration observed at the Gas Service Center site is 55% of the NAAQS.
Memphis-Shelby	47-157-0024	Alabama Avenue	CO	SLAMS	Approved, Shutdown: Memphis-Shelby currently operates three CO monitors in the CBSA, with one monitor required. Memphis-Shelby stated in its five year network assessment that it would request to shut down the Alabama Avenue site in the next five years. The CO concentrations at the Alabama Avenue monitor are approximately 27% of the NAAQS.
Memphis-Shelby	47-157-0075	Shelby Farms NCore	Pb	SLAMS	Approved, Shutdown: On March 28, 2016, the EPA finalized changes to the ambient air monitoring rules for the NCore network design and removed Pb monitoring from the requirements.
Nashville	47-037-0036	Hillwood	PM _{2.5}	SLAMS	Approved, Monitor shutdown: The Hillwood PM _{2.5} monitor will be relocated to the near-road site (AQS # 47-037-0040) to meet near-road PM _{2.5} monitoring requirements.
Nashville	47-037-0002	Trevecca	PM ₁₀	SLAMS	Approved, Shutdown: Nashville requested to shut down the PM ₁₀ monitor at Trevecca due to historically low concentrations. Shutdown of this monitor will allow for resources to be used for other monitoring activities. Nashville requested a waiver for meeting minimum monitoring requirements in the CBSA. One PM ₁₀ monitor will continue to operate in the CBSA.
Nashville	47-037-0024	McCann	PM ₁₀	SLAMS	Approved, Shutdown: Nashville requested to shut down the PM ₁₀ monitor at McCann due to historically low

concentrations. Shutdown of this monitor will allow for resources to be used for other monitoring activities. Nashville requested a waiver for meeting minimum monitoring requirements in the CBSA. One PM₁₀ monitor will continue to operate in the CBSA.

The EPA reviewed these requests for monitor discontinuation and determined that they meet the requirements of 40 CFR §58.14(c) for monitor discontinuation. The minimum monitoring requirements for PM_{2.5}, CO, Pb, and O₃ found in 40 CFR Part 58, Appendix D will continue to be met for the respective MSAs after the approved monitors are discontinued. The minimum monitoring requirements for PM₁₀ will continue to be met in the Memphis, TN-MS-AR CBSA. Nashville is requesting a waiver to the PM₁₀ monitoring requirements under 40 CFR Part 58, Appendix D, Section 4.6, and proposes to operate one PM₁₀ monitor in the CBSA rather than the required two. Due to the historical low readings of PM₁₀ in the Nashville-Davidson-Murfreesboro-Franklin, TN CBSA, the EPA approves the waiver. As a result of this modification to the minimum monitoring requirement, Nashville is required to run one PM₁₀ monitor in the CBSA.

Monitors proposed for relocation, change in sampling frequency, or monitor start-up and the EPA's determination are summarized in Table 3.

Table 3: Proposed Changes in Monitoring

Agency	AQS ID	Site Name	Pollutant	Type	Comments
TDEC	47-125-1009	Clarksville Montgomery County	PM _{2.5}	SLAMS	Not approved, Relocation: TDEC indicated a more detailed relocation request will be submitted to the EPA at a later date. The EPA will evaluate the relocation request at that time.
TDEC	47-105-0108	Loudon Pope	O ₃ , PM _{2.5}	SLAMS	Approved, Relocation: Approved by the EPA on March 16, 2016. The EPA recommends TDEC continue monitoring at the current Loudon Pope O ₃ site through the end of the 2016 O ₃ season before relocating to the Loudon Elementary School site (AQS # 47-105-0109). The EPA approves the calculation of a combined design value for the Loudon Pope O ₃ and the Loudon Elementary School sites.
TDEC	47-163-0007	Ross N. Robinson	SO ₂	SLAMS	Approved, Start-up: Approved by the EPA on May 13, 2016. Satisfies the PWEI requirement for the Kingsport-Bristol-Bristol, TN-VA CBSA
TDEC	47-163-0020	Skyland Dr.	SO ₂	SLAMS	Approved, Start-up: Approved by the EPA on May 13, 2016
Memphis-Shelby	47-157-0047	Guthrie Clinic	PM _{2.5}	SLAMS	Approved, Relocation: Memphis-Shelby requested to relocate the Guthrie Clinic site to Alabama Avenue (AQS # 47-157-0024) due to accessibility of the site on the roof of Guthrie Clinic. The clinic is no longer owned by Shelby County; therefore, accessibility and maintenance of the monitor are challenging.

Memphis-Shelby	47-157-0100	Southwest Tennessee Community College Near-road	PM _{2.5}	SLAMS	Approved, Start-up: To meet near-road PM _{2.5} monitoring requirements by January 1, 2017, the monitor will be operated at the existing near-road site.
Nashville	47-037-0040	Near Road	PM _{2.5}	SLAMS	Approved, Relocation: The Hillwood monitoring site (AQS # 47-037-0036) is being vetted for renovation/demolition. Therefore, the Hillwood PM _{2.5} monitor will be relocated to the existing near-road site in order to meet near road PM _{2.5} monitoring requirements by January 1, 2017.
Nashville	47-037-0023	Lockeland	PM ₁₀	SLAMS	Approved, Start-up: To better utilize resources, the required PM ₁₀ monitor will operate at the existing Lockeland monitoring site beginning January 1, 2017.

Air Quality Index (AQI) Reporting **40 CFR § 58.50**

AQI reporting is required for MSAs with populations of 350,000 or more. There are four MSAs in the state of Tennessee that meet this criterion: Chattanooga, Tennessee-Georgia; Knoxville, Tennessee; Memphis, Tennessee-Mississippi-Arkansas; and Nashville-Davidson-Murfreesboro, Tennessee. The Network Plan indicates that an AQI is being reported in each of these MSAs. Thus, the state is meeting its AQI reporting requirements. In addition, TDEC is voluntarily reporting an AQI for the Kingsport-Bristol-Bristol, TN-VA and the Clarksville, TN-KY CBSAs.

National Core (NCore) Monitoring Network **40 CFR Part 58, Appendix D, Section 3.0**

TDEC designated two NCore sites in its 2016 Network Plan. The first site (AQS # 47-157-0075) is located at Shelby Farms on Haley Road in Memphis and is operated by Memphis-Shelby. The EPA's approval of this site was granted on October 30, 2009. On April 27, 2016, the EPA finalized changes to the new ambient air monitoring rules for the NCore network design and removed Pb monitoring from the requirements. In its Network Plan, Memphis-Shelby requested to shut down the Pb monitor at the Shelby Farms NCore site. The site collected three years of Pb data and did not measure any exceedances of the national ambient air quality standards (NAAQS). The EPA approves the request to shut down the Pb monitor at Shelby Farms NCore site.

The Look Rock site (AQS # 47-009-0101) is designated as a rural NCore site and is located in Great Smoky Mountains National Park. The site has been operated collaboratively for many years by the National Park Service (NPS), the Tennessee Valley Authority (TVA), TDEC, and the EPA. In early 2014, TVA informed the EPA, TDEC, and NPS of its intention to discontinue all air monitoring activities at the site as of October 2014 and transfer ownership of its monitoring equipment to one or more interested parties. The NPS, the TDEC, the EPA Region 4, and the EPA Office of Air Quality and Standards (OAQPS) have agreed to fund and maintain operations of required criteria pollutant measurements except regulatory particulate matter measurements listed in the definition of NCore in 40 CFR §58.1. The pollutants monitored and operational guidelines of the Look Rock site will continue to be based on the data needs of the NPS, the TDEC, and the EPA.

O₃ Monitoring Requirements

40 CFR Part 58, Appendix D, Section 4.1 and Table D-2

The network described in the Network Plan meets the minimum O₃ monitoring requirements specified by 40 CFR Part 58, Appendix D, Table D-2 in all areas. Additionally, the proposed O₃ monitoring network described in the Network Plan meets all of the design criteria of 40 CFR Part 58.

The TDEC proposed to shut down the Blountville O₃ site (AQS # 47-163-2002) at the end of the 2016 O₃ monitoring season. The Kingsport O₃ monitoring site (AQS # 47-163-2003) located in Sullivan County will continue to operate if the Blountville site is approved to be shut down. TDEC indicated a more detailed shutdown request will be submitted to the EPA at a later date; therefore, the EPA is not acting upon TDEC's request at this time. The EPA will reevaluate the proposed shutdown of the Blountville O₃ monitor once TDEC submits a network plan addendum.

The TDEC preliminarily proposed to relocate the Loudon Pope O₃ site (AQS # 47-105-0108) to Loudon Elementary School (formerly Loudon Middle School, AQS # 47-105-0109) in its 2015 Network Plan. On March 4, 2016, TDEC submitted an addendum to the 2015 Network Plan which requested to relocate the Loudon Pope site to Loudon Elementary School. The EPA approved this request on March 16, 2016. When a monitoring site is relocated, the EPA can evaluate whether the air mass at the new site is essentially the same as the air mass at the former site. In cases where the two air masses are deemed to be essentially the same, data from the two sites can be linked in AQS to allow a combined design value (DV) to be calculated. Forty CFR Part 50, Appendix U, Section 2(c) states that a single data record from two sites for the purpose of calculating a combined DV may be approved by the EPA:

“In certain circumstances, including but not limited to site closures or relocations, data from two nearby sites may be combined into a single site data record for the purpose of calculating a valid design value. The appropriate Regional Administrator may approve such combinations after taking into consideration factors such as distance between sites, spatial and temporal patterns in air quality, local emissions and meteorology, jurisdictional boundaries, and terrain features.”

The EPA approves the calculation of a combined DV for the Loudon Pope site and the Loudon Elementary School site for ongoing comparison to the NAAQSs. The EPA recommends TDEC continue monitoring at the current Loudon Pope O₃ site through the end of the 2016 O₃ season before relocating to the Loudon Elementary School site.

The Network Plan states that Chattanooga continues to search for a new location for the Eastside Utility District O₃ monitor (AQS # 47-065-4003). We recommend that Chattanooga consult with the EPA prior to moving the monitor from the existing location. Please note that as soon as Chattanooga identifies a suitable site, the proposed revisions to the network, including the identification of monitors to be discontinued or relocated, must be submitted to the EPA for approval.

CO Monitoring Requirements

40 CFR Part 58, Appendix D, Section 4.2

Ambient air monitoring network design criteria for CO are found in 40 CFR Part 58, Appendix D, Section 4.2. This section requires CBSAs with populations over one million but less than 2.5 million to operate one CO monitor collocated with a near-road NO₂ monitor, by January 1, 2017. This requirement is being met in the Nashville-Davidson-Murfreesboro-Franklin, TN CBSA by the CO monitor operating

at the Near-road site (AQS # 47-037-0040) and in the Memphis, TN-MS-AR CBSA by the CO monitor operating at the Southwest TN Community College near-road site (AQS # 47-157-0100).

Memphis-Shelby operates two CO monitors in addition to the near-road monitor; the Alabama Avenue site (AQS # 47-157-0024) and the Shelby Farms NCore site (AQS # 47-157-0075). Memphis-Shelby requested to shut down the Alabama Avenue CO monitor in the Network Plan. The EPA reviewed the last six years of data (2010-2015), plus the preliminary data for the first quarter of 2016) at the Alabama Avenue site. The highest daily maximum 8-hr CO concentration recorded was 2.4 parts per million (ppm) in December 2011, which is approximately 27% of the 8-hr NAAQS of 9 ppm. Furthermore, the highest recorded 8-hr maximum in the entire CBSA since 2008 was not at the Alabama Avenue site, but rather at the Near-road site in 2015 (3.6 ppm, which is 40% of the NAAQS). Due to the low concentrations of CO at the Alabama Avenue site and because Memphis-Shelby meets the minimum CO monitoring requirements with the existing Near-road and Shelby Farms NCore sites, the EPA approves the request to shut down the Alabama Avenue CO monitor on December 31, 2016. Please update the memorandum of agreement (MOA) with the Mississippi Department of Environmental Quality and Arkansas Department of Environmental Quality accordingly.

The proposed CO monitoring network described in the Network Plan meets all of the design criteria of 40 CFR Part 58.

NO₂ Monitoring Requirements 40 CFR Part 58, Appendix D, Section 4.3

Ambient air monitoring network design criteria for NO₂ are found in 40 CFR Part 58, Appendix D, Section 4.3. Three types of NO₂ monitoring are required: near-road, area-wide, and Regional Administrator required. These types of NO₂ monitoring are described in Sections 4.3.2, 4.3.3, and 4.3.4, respectively.

Near-road monitors are currently operating in Nashville (AQS # 47-037-0040) and Memphis (AQS # 47-157-0100). No other CBSA in Tennessee is required to have near-road NO₂ monitoring.

The EPA's current regulatory requirements include the establishment of an NO₂ near-road site in CBSA's of populations between 500,000 and 1 million by January 1, 2017. The Chattanooga, TN-GA and Knoxville, TN CBSAs fall into this population range as of the U.S. Census Bureau's 2015 estimates. This requirement is under reconsideration. In fact, the EPA published a proposed rule that would remove this NO₂ monitoring requirement (also known as Phase 3 of the near-road network) from Appendix D of 40 CFR Part 58 (<https://www.regulations.gov/document?D=EPA-HQ-OAR-2015-0486-0001>). Accordingly, and with the concurrence of the EPA, Chattanooga and Knoxville have placed a hold on the planning activities for these sites. The EPA plans on completing the associated final rule before the January 1, 2017, deadline for Phase 3 operations.

Ambient air monitoring network design criteria for area-wide NO₂ sites are found in 40 CFR Part 58, Appendix D, Section 4.3.3. Any CBSA with a population of 1,000,000 or more persons is required to monitor a location of expected highest NO₂ concentration representing the neighborhood or larger spatial scales. The East Health Center site (AQS # 47-037-0011) was approved as the area-wide NO₂ monitoring site for the Nashville-Davidson-Murfreesboro-Franklin, TN CBSA in 2013. The area-wide requirement for the Memphis, TN-MS-AR CBSA is being met by the monitor operated in Marion, Arkansas by the state of Arkansas (AQS # 05-035-0005). The operation of this site was agreed to in a

MOA between Memphis-Shelby and the states of Arkansas and Mississippi. The MOA was included in the Network Plan.

Ambient air monitoring network design criteria for the Regional Administrator required NO₂ monitoring, often referred to as RA-40 monitoring, are found in 40 CFR Part 58, Appendix D, Section 4.3.4. This section states that “the Regional Administrators, in collaboration with states, must require a minimum of forty additional NO₂ monitoring stations nationwide in any area, inside or outside of CBSAs, above the minimum monitoring requirements, with a primary focus on siting these monitors in locations to protect susceptible and vulnerable populations. The Regional Administrators, working with states, may also consider additional factors to require monitors beyond the minimum network requirement.” However, not all states are required to have such monitors and EPA did not propose any for Tennessee. As a result, the state did not include a Regional Administrator required NO₂ monitor in its Network Plan. The full list of NO₂ monitors identified by the Regional Administrators can be found on the EPA’s website at <http://www.epa.gov/ttnamti1/svpop.html>.

The NO₂ monitoring network described by TDEC in its Network Plan meets all of the design criteria of 40 CFR Part 58.

SO₂ Monitoring Requirements

40 CFR Part 58, Appendix D, Section 4.4

Ambient air monitoring network design criteria for SO₂ are found in 40 CFR Part 58, Appendix D, Section 4.4. This section requires that “The population weighted emissions index (PWEI) shall be calculated by states for each core based statistical area (CBSA)...” As a result, the SO₂ monitoring site(s) required in each CBSA will satisfy minimum monitoring requirements if the monitor(s) is sited within the boundaries of the parent CBSA and is of the following site types: population exposure, maximum concentration, source-oriented, general background, or regional transport. A SO₂ monitor at an NCore station may satisfy minimum monitoring requirements if that monitor is located within a CBSA with minimally required monitors consistent with Appendix D, Section 4.4.

The TDEC operates SO₂ monitors in Anderson County (AQS # 47-001-0101) and Sullivan County (AQS # 47-163-0007) to meet the PWEI requirement of one SO₂ monitor for the Knoxville, TN CBSA and the Kingsport-Bristol-Bristol, TN-VA CBSA, respectively. SO₂ monitors are also required and operating in the Memphis, TN-MS-AR CBSA (AQS # 47-157-0075) and the Nashville-Davidson-Murfreesboro-Franklin, TN CBSA (AQS # 47-037-0011) to meet the PWEI requirement of one SO₂ monitor for each respective CBSA.

The EPA finalized the SO₂ Data Requirements Rule (DRR) on August 10, 2015. This rule requires characterization of the air quality near sources with SO₂ emissions greater than 2,000 tons per year by conducting ambient air monitoring or modeling. On June 7, 2016, the TDEC submitted a final list of five sources in Tennessee around which SO₂ air quality must be characterized to the EPA. The five sources will either be characterized using modeling or taking a federally enforceable emissions limit. TDEC is not proposing any SO₂ monitoring sites under the DRR.

Pb Monitoring Requirements

40 CFR Part 58, Appendix A, Section 3.4

40 CFR Part 58, Appendix D, Section 4.5

The monitoring requirements for Pb found at 40 CFR Part 58, Appendix D, Section 4.5 require that "At a minimum, there must be one source-oriented SLAMS [State and Local Air Monitoring Station] site located to measure the maximum Pb concentration in ambient air resulting from each non-airport Pb source which emits 0.50 or more tons per year and from each airport which emits 1.0 or more tons per year..." Currently, monitoring is required near two sources in Tennessee: the Exide Technologies facility in Bristol and the Gerda facility in Knoxville. Monitors, including collocated quality control monitors, near both of these sources are identified in the plan.

The requirement to measure Pb-PM₁₀ at NCore sites in areas over 500,000 in population was proposed for elimination due to the extremely low concentrations being measured at these sites. On March 28, 2016, the EPA published changes in the ambient air monitoring rules for the NCore network design and removed Pb monitoring from the requirements (81 FR 17248). This final rule became effective on April 27, 2016. As a result, Memphis-Shelby collected its final Pb sample on June 29, 2016 at the Shelby Farms NCore site (AQS # 47-157-0075). The Pb monitoring network described in the Network Plan meets all of the design criteria of 40 CFR Part 58.

PM₁₀ Monitoring Requirements

40 CFR Part 58, Appendix A, Section 3.3

40 CFR Part 58, Appendix D, Section 4.6 and Table D-4

The minimum number of PM₁₀ monitors required for the Nashville CBSA is two PM₁₀ monitors. Nashville operates two PM₁₀ monitors: one at Trevecca (AQS # 47-037-0002) and one at McCann (AQS # 47-037-0024). In the Network Plan, Nashville requested a waiver of the minimum monitoring requirement. Nashville would like to shut down both existing sites and establish one continuous PM₁₀ monitor at the existing Lockeland site (AQS # 47-037-0023) in order to better utilize resources. The EPA reviewed the last six years of data (2010-2015, plus the preliminary data for the first quarter of 2016) from the Trevecca and McCann sites. The highest daily mean concentration was recorded on June 23, 2015, at both sites. The highest PM₁₀ concentration at the Trevecca site was 66 µg/m³ (approximately 44% of the NAAQS) and the highest PM₁₀ concentration at the McCann site was 69 µg/m³ (approximately 46% of the NAAQS). Due to the historically low concentrations of PM₁₀ concentrations at the Trevecca and McCann sites, the EPA approves the waiver request, the shut down the Trevecca and McCann sites on December 31, 2016, and the establishment of a continuous PM₁₀ monitor at the Lockeland site. Please note that the waiver request must be renewed during the next five year network assessment (2020).

Memphis-Shelby is required to operate, at minimum, two PM₁₀ monitors in the CBSA. Memphis-Shelby currently operates three PM₁₀ monitors in the CBSA. The three monitors include the required monitor at Shelby Farms NCore (AQS # 47-157-0075), a continuous PM₁₀ monitor at Alabama Avenue (AQS # 47-157-0024), and a filter-based monitor at the Gas Service Center (AQS # 47-157-0016). Memphis-Shelby requested in the Network Plan to discontinue the PM₁₀ monitor at the Gas Service Center Site. The EPA reviewed the last six years of data (2010-2015, plus the preliminary data for the first quarter of 2016) from the Gas Service Center site. The highest daily maximum PM₁₀ concentration was 82 µg/m³ on June 23, 2015, which is approximately 55% of the NAAQS. Due to the historically low readings of PM₁₀ at the Gas Service Center, the EPA approves the shutdown on December 31, 2016. Please update the MOA

with Mississippi Department of Environmental Quality and Arkansas Department of Environmental Quality accordingly.

In addition to the ongoing monitoring at the Air Lab site (AQS # 47-093-1013), Knox intends to replace the PM₁₀ high volume (hi-vol) monitors with a TEOM 1405a FEM continuous PM₁₀ monitor. The continuous monitor will be collocated with the hi-vol monitors until the standard operating procedure for the continuous PM₁₀ monitor is approved by SED and the instrument's quality assurance procedures are incorporated into Knox's quality management plan and quality assurance project plan (QAPP). The EPA notes the TEOM 1405a must be incorporated into an approved QAPP prior to reporting data to AQS as FEM PM₁₀ data.

All PM₁₀ collocation requirements for manual methods found in 40 CFR Part 58, Appendix A, 3.3.4 are being met. Fifteen percent of each network of manual PM₁₀ methods (at least one site) must be collocated. Also, the sites with collocated monitors should be among those measuring annual mean concentrations in the highest 25 percent of the network. These collocation requirements are assessed at the primary quality assurance organization (PQAO) level.

PM_{2.5} Monitoring Requirements

40 CFR Part 58, Appendix A, Section 3.2.3

40 CFR Part 58, Appendix D, Section 4.7 and Table D-5

The state of Tennessee's PM_{2.5} monitoring network meets the minimum requirements found in 40 CFR Part 58, Appendix D, Table D-5 for all MSAs. All manual PM_{2.5} collocation requirements found in 40 CFR Part 58, Appendix A, Section 3.2.3 are also being met. Fifteen percent of each network of manual PM_{2.5} methods (at least one site) must be collocated. Additionally, according to Appendix A, 3.2.3.4, 50 percent of collocated monitors should be deployed at sites with annual mean concentrations within +/- 20 percent of the NAAQS. The PM_{2.5} monitoring network described in the 2016 Network Plan meets all of the design criteria of 40 CFR Part 58.

The TDEC preliminarily proposed that the Loudon Pope PM_{2.5} site (AQS # 47-105-0108) be relocated to Loudon Elementary School (formerly Loudon Middle School, AQS # 47-105-0109) in the 2015 Network Plan. On March 4, 2016, the TDEC submitted an addendum to the Network Plan requesting to relocate the Loudon Pope site to Loudon Elementary School. The EPA approved this request on March 16, 2016.

In instances where relocation occurs, the sites may be deemed to be measuring the same air mass. In these cases, the DVs from the two sites can be linked in order to create a combined DV. The EPA approves the calculation of a combined DV for the Loudon Pope site and the Loudon Elementary School site for ongoing comparison to the NAAQS. The EPA recommends that the TDEC continue monitoring at the current Loudon Pope site through the end of the 2016 before relocating to the Loudon Elementary School site.

The TDEC proposed to relocate the Clarksville PM_{2.5} monitoring site (AQS # 47-125-1009) to Paradise Hill Road due to safety concerns of the elevated platforms. Removal of the platforms would leave the existing site not meeting siting criteria. The TDEC submitted a request to relocate the site in the Network Plan. EPA has two comments on the request. First, in the photographs provided by TDEC, there is a group of trees to the southwest of the proposed Paradise Hill Road site. The winds at this location appear to come primarily from the southwest. While the trees are not currently an obstruction, there is a high likelihood that as they grow they will become an obstruction in future years. To avoid

future siting issues, the EPA suggests that the TDEC consider tree location and growth potential when placing the monitor. Second, the TDEC proposed to establish the monitoring site on a gravel bed. Forty (40) CFR Part 58, Appendix E (3)(a) states "Particulate matter sites should not be located in an unpaved area unless there is vegetative ground cover year round, so that the impact of windblown dusts will be kept to a minimum." The EPA will continue to work with the TDEC to find an appropriate monitor location. Once the details of the site are finalized, the state will need to submit an addendum to the Network Plan containing the site proposal. The addendum must include all of the required information for proposed sites under 40 CFR §58.10(b). Additionally, the MOA between Tennessee and Kentucky states that the TDEC will notify Kentucky in advance of its intent to relocate or shutdown any of the PM_{2.5} monitors. Please notify Kentucky of the possible relocation of the Clarksville PM_{2.5} monitor. The EPA acknowledges the importance of addressing the safety concerns at the Clarksville site.

We understand that transportation authorities in Chattanooga are considering roadwork along Siskin Drive next to where the PM_{2.5} site is located (AQS # 47-065-4002), but that the schedule is uncertain at this time. This roadwork project will likely include widening Siskin Drive and the construction area may include part or the whole space of where the Siskin Drive site is located. We also understand that the Chattanooga local agency will begin searching for a new site within a mile radius to be prepared for a site move, if required. To ensure that the EPA agrees that siting criteria are met at any new location, we recommend that Chattanooga work with the EPA prior to seeking approval to move the monitor from the existing location.

Chattanooga operates a special purpose monitor (SPM) at the East Ridge City Hall site (AQS # 47-065-0031). Forty (40) CFR Part 58.20(c) states "All data from an SPM using an FRM, FEM, or ARM which has operated for more than 24 months are eligible for comparison to the relevant NAAQS..." Operation of this site began in 1999 (moved to the current location in 2007) and it recorded the highest DVs in the Tennessee portion of the Chattanooga MSA for 2011-2013, 2012-2014, and 2013-2015. Because this site can be used for regulatory purposes and has higher DVs than the SLAMS monitor in Chattanooga (Siskin Drive, AQS # 47-065-4002), we believe the East Ridge City Hall monitor should be classified as a SLAMS monitor rather than an SPM. The PM_{2.5} monitoring requirements in 40 CFR Part 58, Appendix D, Section 4.7.1(b)(1) require that "at least one monitoring station is to be sited at neighborhood or larger scale in an area of expected maximum concentration." To meet this requirement, Chattanooga needs to change the monitoring type for the East Ridge City Hall monitor to SLAMS in AQS and in the next Network Plan.

Memphis-Shelby requested to relocate the Guthrie Clinic PM_{2.5} monitor (AQS # 47-157-0047) to the existing Alabama Avenue site (AQS # 47-157-0024) due to safety and roof access concerns. The clinic is no longer owned by Shelby County; therefore, both accessibility and maintenance of the monitor are challenging. The EPA reviewed the PM_{2.5} daily means, annual averages, and DVs for the four sites in the CBSA [one monitor in Crittenden County, AR (AQS # 05-035-0005), one monitor in DeSoto County, MS (AQS # 28-033-0002), and two monitors in Memphis-Shelby (AQS # 47-157-0047 and 47-157-0075)]. The EPA determined that two out of the three other PM_{2.5} monitors in the CBSA recorded higher daily means, annual averages, and DVs than the Guthrie Clinic site. Based on these analyses results and the close proximity of the location to the Alabama Avenue site, the EPA approves the permanent shutdown of the Guthrie Clinic site and the start-up of a PM_{2.5} monitor at the Alabama Avenue site (AQS # 47-157-0024). The Memphis, TN-MS-AR CBSA will continue to meet PM_{2.5} minimum monitoring requirements for the CBSA.

PM_{2.5} Near-road Monitoring Requirements
40 CFR Part 58, Appendix D, Section 4.7.1(b)(2)

Regulatory requirements in 40 CFR Part 58, Appendix D, 4.7.1(b)(2) require that “CBSAs with a population of 1,000,000 or more persons, at least one PM_{2.5} monitor is to be collocated at a near-road NO₂ station.” PM_{2.5} near-road monitoring is required in the Memphis, TN-MS-AR CBSA and the Nashville-Davidson-Murfreesboro-Franklin, TN CBSA by January 1, 2017. The Network Plan stated that to meet this requirement the local agencies will add PM_{2.5} monitoring to the Memphis-Shelby’s Southwest Tennessee Community College near-road site (AQS # 47-157-0100) and the Nashville near-road site (AQS # 47-037-0040) by that date.

PM_{2.5} Continuous Monitoring Requirements
40 CFR Part 58, Appendix D, Section 4.7.2

Regulatory requirements for continuous PM_{2.5} monitoring require that “The State, or where appropriate, local agencies must operate continuous PM_{2.5} analyzers equal to at least one-half (round up) the minimum required sites listed in Table D–5 of this appendix. At least one required continuous analyzer in each MSA must be collocated with one of the required FRM/FEM/ARM [federal reference method/federal equivalent method /approved regional method] monitors, unless at least one of the required FRM/FEM/ARM monitors is itself a continuous FEM or ARM monitor in which case no collocation requirement applies.” These minimum continuous PM_{2.5} monitoring requirements are being met in all of the MSAs in the state. Also, the continuous PM_{2.5} collocation requirements are being met in all MSAs. Therefore, the continuous PM_{2.5} monitoring network described in the Network Plan meets all of the design criteria of 40 CFR Part 58.

The TDEC is replacing a large portion of its PM_{2.5} FRM network with BAM 1022 FEM continuous monitors and will eventually equip all PM_{2.5} sites with BAM 1022 continuous monitors. Once the FEM monitors are installed, TDEC will conduct a period of correlation testing with the FRM and FEM samplers. After suitable amounts of data are generated, the collocated FRM samplers will be evaluated for possible shutdown. The need for meeting collocation requirements for the remaining filter-based FRMs will be addressed based on the remaining network and minimum requirements for collocation.

PM_{2.5} Background and Transport Sites
40 CFR Part 58, Appendix D, Section 4.7.3

40 CFR Part 58, Appendix D, Section 4.7.3 requires that “each State shall install and operate at least one PM_{2.5} site to monitor for regional background and at least one PM_{2.5} site to monitor for regional transport.” The following sites were identified in AQS as background (Table 4) and transport sites (Table 5). The EPA requests that the TDEC provide a statement or table showing which PM_{2.5} monitors are background and transport sites in its 2017 Network Plan because it is difficult to determine which monitors meet these requirements. For example, the East Ridge City Hall site (AQS# 47-065-0031) is listed in AQS as a regional transport site, but the monitoring objective in the Network Plan only lists population exposure. No monitoring sites in the state are listed with a monitoring objective of regional transport in the Network Plan; therefore, the Network Plan does not show how the requirement is met.

Table 4. PM_{2.5} Background Sites

AQS ID	County Name	CBSA Short Name	Parameter Description	Monitoring Objective
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47-009-0101	Blount	Knoxville, TN	Acceptable PM _{2.5} AQI & Speciation Mass	GENERAL/BACKGROUND
47-099-0002	Lawrence	Lawrenceburg, TN	PM _{2.5} - Local Conditions Acceptable PM _{2.5} AQI & Speciation Mass	UPWIND BACKGROUND
47-163-1007	Sullivan	Kingsport-Bristol-Bristol, TN-VA	PM _{2.5} Raw Data	UPWIND BACKGROUND

Table 5. PM_{2.5} Transport Sites

AQS ID	County Name	CBSA Short Name	Parameter Description	Monitoring Objective
47-065-0031	Hamilton	Chattanooga, TN-GA	PM _{2.5} - Local Conditions	REGIONAL TRANSPORT

PM_{2.5} Chemical Speciation Network (CSN) **40 CFR Part 58, Appendix D, Section 4.7.4**

The state of Georgia operates a PM_{2.5} speciation monitor in the Chattanooga-Hamilton County/North Georgia/Alabama designation area (AQS # 13-295-0002) and Knox operates a supplemental speciation monitor at the Spring Hill monitoring site (AQS # 47-093-1020). The operation of these monitors is consistent with the CSN review recently completed by EPA.

Photochemical Assessment Monitoring Stations (PAMS) **40 CFR Part 58, Appendix D, Section 5.0**

With the promulgation of a new ozone NAAQS on October 1, 2015, the EPA finalized changes to the PAMS requirements. By June 1, 2019, Memphis-Shelby will be required to implement PAMS monitoring the NCore site at Shelby Farms (AQS # 47-157-0075). The EPA will work closely with Memphis-Shelby to work through the implementation challenges of this new monitoring program. At this time, however, the PAMS requirement is being met in the state.

Memoranda of Agreement (MOA) with Neighboring States

The TDEC and its local agencies maintain several MOAs with its neighboring jurisdictions to address minimum monitoring requirements. The TDEC and Kentucky have an MOA addressing O₃ and continuous PM_{2.5} monitoring in the Clarksville, TN-KY CBSA. The TDEC and Virginia have an MOA addressing O₃ in the Kingsport-Bristol-Bristol, TN-VA CBSA. Memphis-Shelby, Arkansas, and Mississippi have an MOA addressing PM₁₀, PM_{2.5}, and O₃ monitoring in the Memphis, TN-MS-AR CBSA. Chattanooga and Georgia have an MOA addressing PM₁₀, PM_{2.5}, and O₃ monitoring in the Chattanooga, TN-GA CBSA.

Site Assessments

In reference to the network plan, 40 CFR § 58.10(a)(1) states “[t]he plan shall include a statement of whether the operation of each monitor meets the requirements of appendices A, B, C, D, and E of this part, where applicable. The Regional Administrator may require additional information in support of this statement.” Your agency includes specific information showing how Appendices A, B, C, and D are met, but does not discuss how Appendix E siting criteria are met. The EPA interprets this reference to Appendix E to mean agencies should provide evidence in the annual network plan demonstrating that monitoring sites continue to meet siting requirements. The EPA’s position is supported by a December

17, 2015, Office of Inspector General (OIG) finding in a report titled "EPA Can Strengthen Its Reviews of Small Particle Monitoring in Region 6 to Better Ensure Effectiveness of Air Monitoring Network." In this report, the OIG determined that "[i]f the annual plan does not verify siting criteria, changed conditions at a site could go unnoticed until the next technical systems audit." Therefore, the EPA expects agencies to include annual siting evaluations as part of the network plan process. Information can be provided in table format and should include:

- the date in which the last siting review was conducted,
- measurements from inlet to nearest tree driplines and obstructions,
- the height of any possible obstructions, and
- any findings and how they will be addressed

Please include this site assessment information for all monitoring sites in the TDEC's 2017 Network Plan.



Jim Holloway <jholloway@chattanooga.gov>

air toxics APA Commitments

1 message

Smith, Miya <Smith.Miya@epa.gov>
To: Jim Holloway <jholloway@chattanooga.gov>

Tue, Aug 9, 2016 at 3:22 PM

5. Assume delegation and implementation of all promulgated Clean Air Act Section 112, 111, and 129 rules and standards [National Emission Standard for Hazardous Air Pollutant (NESHAP), and New Source Performance Standards (NSPS)] within 9 to 12 months of EPA's promulgation, as appropriate, if a rulemaking is required to take delegation via the Agency's CAA Title V approval process. Notify Region 4 by submitting rule adoption documentation within 60 days of adoption.

Chattanooga Yes, Will adopt new and changed NESHAPS, MACT Standards, Residual Risk Rules, Area Source Standards and
Response: NSPS as funding and staffing permits.
Last EPA page - 11:52:09 on 08/01/16 - page -

8. Maintain a record of all approved alternatives to monitoring, testing, recordkeeping, and reporting requirements made for sources subject to MACT standards and report number of requests processed semi-annually (this is required by rule; see 40 CFR Part 63.91 (e)(1)(ii)).

Chattanooga Response: Yes
Last EPA Reviewer: page - 11:52:35 on 08/01/16 - page -

Lee Page (404) - 562-9131

Miya Smith

Grants and Strategic Planning Office

Air, Pesticides and Toxics Management Division

US Environmental Protection Agency, Region 4

(404) 562-9091

<http://www.epa.gov/aboutepa/about-epa-region-4-southeast>



Alan Frazier <afrazier@chattanooga.gov>

Semiannual Report of Requests for Alternatives to MACT Requirements

1 message

Alan Frazier <afrazier@chattanooga.gov>

Tue, Nov 15, 2016 at 3:44 PM

To: page.lee@epa.gov

Cc: Bob Colby <bcolby@chattanooga.gov>, Jim Holloway <jholloway@chattanooga.gov>

Lee,

In accordance with Item 8 under "Reduce Air Toxics" of our *Air Planning Agreement for Fiscal Year 2016*, no requests for alternatives to monitoring, testing, recordkeeping, or reporting requirements of any applicable MACT standard were received during the six-month period from April 1, 2016, through September 30, 2016, from any source within Hamilton County, Tennessee.

Please contact me if you have any questions or if I can be of any further assistance.

Regards,
Alan

J. Alan Frazier, P.E.

Engineering Manager

Chattanooga-Hamilton County

Air Pollution Control Bureau

6125 Preservation Drive, Suite 140

Chattanooga, TN 37416-3740

Direct: 423-643-5978

Main: 423-643-5970

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afrazier@chattanooga.gov

www.apcb.org



Alan Frazier <afrazier@chattanooga.gov>

Semiannual Report of Requests for Alternatives to MACT Requirements

1 message

Alan Frazier <afrazier@chattanooga.gov>

Wed, Aug 10, 2016 at 8:25 AM

To: page.lee@epa.gov, Jim Holloway <jholloway@chattanooga.gov>, Bob Colby <bcolby@chattanooga.gov>

Lee,

In accordance with Item 8 of "Reduce Air Toxics" of our *Air Planning Agreement for Fiscal Year 2016*, no requests for alternatives to monitoring, testing, recordkeeping, or reporting requirements for any applicable MACT standard were received during the six-month period from October 1, 2015, through March 31, 2016, from any source within Hamilton County, Tennessee.

Please contact me if you have any questions or if I can be of any further assistance.

Regards,
Alan

J. Alan Frazier, P.E.

Engineering Manager

Chattanooga-Hamilton County

Air Pollution Control Bureau

6125 Preservation Drive, Suite 140

Chattanooga, TN 37416-3740

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Semiannual Title V Permit Data Report

This information request is authorized pursuant to the Information Collection Request for Part 70 Operating Permit Regulations, EPA Number 1587.06, OMB Number 2060-0243; April 2004.

Permitting Authority:	Chattanooga-Hamilton County Air Pollution Control Bureau	
Report Date:	January 3, 2017	
Reporting Period:	<input type="checkbox"/> January 01 – June 30, *Report due July 31*	<input checked="" type="checkbox"/> July 01 – December 31, 2016 *Report due January 31*

Data Element	Reported Value	Information
1. Outstanding Permit Issuance	a) Number of final actions: not applicable	<ul style="list-style-type: none"> Total final actions on Permitting Authority-specific permit issuance commitments (i.e., agreements by the Permitting Authority to complete action on initial permits within a specified time-frame, such as agreements related to the 2001 citizen comments). If the Permitting Authority does not have a commitment, enter "not applicable" in 1(a) and 1(b).
	b) Total commitment universe: not applicable	
	c) Date commitment completed (if applicable):	
2. Total Current Part 70 Source Universe and Permit Universe	a) Number of active part 70 <u>sources</u> that have obtained part 70 permits, plus the number of active part 70 <u>sources</u> that have not yet obtained part 70 permits: 15	<ul style="list-style-type: none"> The total current part 70 <u>source</u> universe includes all sources subject to the Permitting Authority's part 70 program applicability requirements (i.e., provisions comparable to §70.3). In 2.a), count all active sources that either have obtained or will obtain a part 70 permit. EPA expects that this data will be primarily based on the Permitting Authority's application and permit tracking information. If, however, the Permitting Authority is aware of part 70 sources that are not yet captured by application or permit information, count those sources as well. Do <u>not</u> count sources that are no longer subject to part 70, such as sources that have shut down, or become natural minors or synthetic minors, and do not have an active part 70 permit. Do <u>not</u> double count sources included in 2.b).

Total Current Part 70 Source Universe and Permit Universe (Continued)	b) Number of part 70 <u>sources</u> that have applied to obtain a synthetic minor restriction in lieu of a part 70 permit, and the part 70 program's permit application due dates for those sources have passed: 0	<ul style="list-style-type: none"> Element 2.b) is intended to capture the universe of part 70 sources that are seeking synthetic minor restrictions in lieu of part 70 permits, but haven't received those restrictions before becoming subject to the part 70 program's permit application requirements. If the part 70 applications don't readily identify sources seeking such restrictions, the Permitting Authority may include those sources in 2.a), and need not break them out here. However, EPA expects Permitting Authorities to consider pending synthetic minor requests <u>not</u> addressed in part 70 applications to calculate this portion of the part 70 source universe. Count sources that currently meet the part 70 program's applicability requirements, their part 70 application due dates have passed, and they have requested but not yet received synthetic minor restrictions in lieu of a part 70 permit (or permit renewal). Also count active sources whose synthetic minor restrictions have expired (i.e., no synthetic minor restrictions are currently in place, even though they may be eligible for such restrictions) and are past their part 70 program's application due date. Do <u>not</u> count sources that have active synthetic minor restrictions and are no longer subject to part 70. Do <u>not</u> double count sources included in 2(a).
	c) Total number of current part 70 <u>sources</u> (a+b): 15	
	d) <i>For permitting authorities that issue multiple part 70 permits to a single source:</i> total number of active part 70 <u>permits</u> issued, plus part 70 <u>permits</u> applied for: not applicable	<ul style="list-style-type: none"> For Permitting Authorities that issue multiple part 70 permits to a single source, and these permits are issued and tracked separately, report the total permit universe, including # of active part 70 permits issued (element 3 below), plus permits applied for (based on pending applications). This information is for correlating data when the Permitting Authority's part 70 <u>permit</u> universe may be greater than the part 70 <u>source</u> universe. For Permitting Authorities that do not issue multiple permits to a single source, or for those that issue and track multiple permits issued to a source on a source-wide basis, enter "not applicable" in 2.d).

3. Total Active Part 70 Permits	<p>Total number of active part 70 permits:</p> <p>13</p>	<ul style="list-style-type: none"> • This element includes all <u>active</u> initial and renewal part 70 permits issued by the permitting authority. Do <u>not</u> count inactive permits, i.e., permits that are no longer in effect due to source shutdown, synthetic minor restrictions, etc. Note: the procedures for rendering part 70 permits no longer effective may vary, depending on the part 70 program. • Do <u>not</u> count both initial and renewal permits (or prior renewal and current renewal permits) issued to the same source; i.e., do not double count. • Count permits that have been extended (see 6.b. below), but do <u>not</u> count permits that have expired, or have been voided, revoked, etc. • Count each source covered by a general permit separately for this data element. If a single source has several general permits and/or source specific permits, refer to the information for permitting authorities that issue multiple part 70 permits to a single source. • For permitting authorities that issue multiple part 70 permits to a single source and included information in element 2(d), count each permitted portion of the source separately for this element. This distinction is for correlating this data element with the permit universe information in element #2(d).
4. Timeliness of Initial Permits (PART element)	<p>a) Total number of initial part 70 permits issued during 6 month reporting period:</p> <p>0</p>	<ul style="list-style-type: none"> • This data element tracks the initial part 70 permits issued as final (e.g., not draft or proposed) during the 6 month reporting period covered by this report, and whether they were issued within 18 months of receipt of an administratively complete application. • For TOPS purposes, initial permits are permits that are issued to any source that has become subject to part 70 for the first time, or any source that comes back into the part 70 program after a period of not being subject. • If no initial permits were issued during the 6 month reporting period, report "zero" in 4(b), and "not applicable" in 4(a).
	<p>b) Number of initial part 70 permits finalized during 6 month reporting period that were issued within 18 months:</p> <p>not applicable</p>	

5. Total Outstanding Initial Part 70 Applications	<p>The number of active initial part 70 applications older than 18 months:</p> <p>2</p>	<ul style="list-style-type: none"> • This element tracks <u>all</u> active, administratively complete <u>initial</u> part 70 permit applications that the permitting authority has not taken final action on within 18 months of receipt of the administratively complete application. Do not stop or restart the 18 month clock for additional information submitted after the application is deemed administratively complete. • For TOPS purposes, initial part 70 applications are applications for sources that are subject to title V for the first time, or for any source that comes back into the title V program after a period of not being subject. Do <u>not</u> include renewal applications. • Include all current outstanding initial applications, including those that may also be tracked in data element #1. • Do <u>not</u> count initial applications the Permitting Authority has taken final action on.
6. Outstanding Renewal Permit Actions	<p>a) Total number of expired permits for active part 70 sources:</p> <p>0</p>	<ul style="list-style-type: none"> • This data element tracks the total number of expired permits for active part 70 sources. Part 70 permits expire after 5 years if the sources do not submit timely and complete renewal applications, or if they have lost their application shield by not timely responding to additional requests for information. • Include expired permits that have been addressed through consent orders or other enforcement mechanisms. Expired permits can be further addressed in the "Additional Information" element. • Do <u>not</u> include permits that have expired because the source is no longer subject to Title V; i.e., they have shutdown or have received synthetic minor restrictions. <p>For permitting authorities that issue multiple part 70 permits to a single source and included information in 2(d), count each expired permit separately.</p>

Outstanding Renewal Permit Actions (Continued)	b) Total number of active permits with terms extended past 5 years: 4	<ul style="list-style-type: none"> • This data element tracks the total number of active permits that have been extended past the original 5 year permit term. Part 70 permits or permit conditions are extended beyond the original 5 year term when sources submit a timely and complete renewal application (and any timely and complete additional information requested by the permitting authority), but the permitting authority has not yet issued a renewal permit. • Count all extended permits, including extended permits for sources that submitted timely and complete renewal applications within the last 18 months. Pending applications that are less than 18 months old can be further addressed in the "Additional Information" element. • Do <u>not</u> include inactive extended permits, i.e., when a subsequent permit renewal has been issued or a source is no longer subject to part 70. • Do <u>not</u> include "expired part 70 permits" that have been addressed through consent orders or other enforcement mechanisms. Count expired permits in 6(a). • For permitting authorities that issue multiple part 70 permits to a single source and included information in 2(d), count each extended permit separately.
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7. Timeliness of Significant Modifications (PART element - a and b only)	a) Total number of significant modifications issued during 6 month reporting period: 0	<ul style="list-style-type: none"> This data element tracks the number of significant modifications issued as final (e.g., not draft or proposed) during the 6 month reporting period. It also tracks the number of those modifications that were issued within 18 months of receipt of an administratively complete significant modification application, and also the number that were issued within 9 months. Note that 7(c) is a subset of 7(b). If no significant modifications were issued during the 6 month reporting period, report "zero" in 7(a) and "not applicable" in 7(b) and 7(c). Start the application clock on the submittal date of an administratively complete significant modification application. Do not restart the clock for additional information submissions.
	b) Number of significant modifications finalized during 6 month reporting period that were issued within 18 months: not applicable	
	c) Number of significant modifications finalized during 6 month reporting period that were issued within 9 months: not applicable	
8. Outstanding Significant Permit Modifications	Total number of active significant modification applications older than 18 months: 0	<ul style="list-style-type: none"> This element tracks all active, administratively complete significant permit modification applications that the permitting authority has not taken final action on within 18 months of receipt of the administratively complete application. Do not stop or restart the 18 month clock for additional information submitted after the application is deemed administratively complete. Do <u>not</u> count significant modification applications the Permitting Authority has taken final action on.
9. Comments and Additional Information	Two synthetic minor sources each submitted a complete initial Part 70 permit application in December 2013, as required by 40 CFR 63 Subpart VVVVVV. Neither source has yet been issued a Part 70 permit. The four sources with extended Part 70 permits submitted complete renewal Part 70 permit applications in June 2013, January 2014, March 2014, and October 2014, respectively.	Permitting authorities may provide any additional information in this section. For example, a permitting authority may address data changes, data management issues, general permits, multiple permits issued to single stationary sources, synthetic minor information, additional relevant data, etc.

Semiannual Title V Permit Data Report

This information request is authorized pursuant to the Information Collection Request for Part 70 Operating Permit Regulations, EPA Number 1587.06, OMB Number 2060-0243; April 2004.

Permitting Authority:	Chattanooga-Hamilton County Air Pollution Control Bureau	
Report Date:	September 13, 2016	
Reporting Period:	<input checked="" type="checkbox"/> January 01 – June 30, 2016 *Report due July 31*	<input type="checkbox"/> July 01 – December 31, *Report due January 31*

Data Element	Reported Value	Information
1. Outstanding Permit Issuance	a) Number of final actions: not applicable	<ul style="list-style-type: none"> Total final actions on Permitting Authority-specific permit issuance commitments (i.e., agreements by the Permitting Authority to complete action on initial permits within a specified time-frame, such as agreements related to the 2001 citizen comments). If the Permitting Authority does not have a commitment, enter "not applicable" in 1(a) and 1(b).
	b) Total commitment universe: not applicable	
	c) Date commitment completed (if applicable):	
2. Total Current Part 70 Source Universe and Permit Universe	a) Number of active part 70 <u>sources</u> that have obtained part 70 permits, plus the number of active part 70 <u>sources</u> that have not yet obtained part 70 permits: 16	<ul style="list-style-type: none"> The total current part 70 <u>source</u> universe includes all sources subject to the Permitting Authority's part 70 program applicability requirements (i.e., provisions comparable to §70.3). In 2.a), count all active sources that either have obtained or will obtain a part 70 permit. EPA expects that this data will be primarily based on the Permitting Authority's application and permit tracking information. If, however, the Permitting Authority is aware of part 70 sources that are not yet captured by application or permit information, count those sources as well. Do <u>not</u> count sources that are no longer subject to part 70, such as sources that have shut down, or become natural minors or synthetic minors, and do not have an active part 70 permit. Do <u>not</u> double count sources included in 2.b).

Total Current Part 70 Source Universe and Permit Universe (Continued)	b) Number of part 70 <u>sources</u> that have applied to obtain a synthetic minor restriction in lieu of a part 70 permit, and the part 70 program's permit application due dates for those sources have passed: 0	<ul style="list-style-type: none"> Element 2.b) is intended to capture the universe of part 70 sources that are seeking synthetic minor restrictions in lieu of part 70 permits, but haven't received those restrictions before becoming subject to the part 70 program's permit application requirements. If the part 70 applications don't readily identify sources seeking such restrictions, the Permitting Authority may include those sources in 2.a), and need not break them out here. However, EPA expects Permitting Authorities to consider pending synthetic minor requests <u>not</u> addressed in part 70 applications to calculate this portion of the part 70 source universe. Count sources that currently meet the part 70 program's applicability requirements, their part 70 application due dates have passed, and they have requested but not yet received synthetic minor restrictions in lieu of a part 70 permit (or permit renewal). Also count active sources whose synthetic minor restrictions have expired (i.e., no synthetic minor restrictions are currently in place, even though they may be eligible for such restrictions) and are past their part 70 program's application due date. Do <u>not</u> count sources that have active synthetic minor restrictions and are no longer subject to part 70. Do <u>not</u> double count sources included in 2(a).
	c) Total number of current part 70 <u>sources</u> (a+b): 16	
	d) <i>For permitting authorities that issue multiple part 70 permits to a single source:</i> total number of active part 70 <u>permits</u> issued, plus part 70 <u>permits</u> applied for: not applicable	<ul style="list-style-type: none"> For Permitting Authorities that issue multiple part 70 permits to a single source, and these permits are issued and tracked separately, report the total permit universe, including # of active part 70 permits issued (element 3 below), plus permits applied for (based on pending applications). This information is for correlating data when the Permitting Authority's part 70 <u>permit</u> universe may be greater than the part 70 <u>source</u> universe. For Permitting Authorities that do not issue multiple permits to a single source, or for those that issue and track multiple permits issued to a source on a source-wide basis, enter "not applicable" in 2.d).

3. Total Active Part 70 Permits	Total number of active part 70 permits: 14	<ul style="list-style-type: none"> • This element includes all <u>active</u> initial and renewal part 70 permits issued by the permitting authority. Do <u>not</u> count inactive permits, i.e., permits that are no longer in effect due to source shutdown, synthetic minor restrictions, etc. Note: the procedures for rendering part 70 permits no longer effective may vary, depending on the part 70 program. • Do <u>not</u> count both initial and renewal permits (or prior renewal and current renewal permits) issued to the same source; i.e., do not double count. • Count permits that have been extended (see 6.b. below), but do <u>not</u> count permits that have expired, or have been voided, revoked, etc. • Count each source covered by a general permit separately for this data element. If a single source has several general permits and/or source specific permits, refer to the information for permitting authorities that issue multiple part 70 permits to a single source. • For permitting authorities that issue multiple part 70 permits to a single source and included information in element 2(d), count each permitted portion of the source separately for this element. This distinction is for correlating this data element with the permit universe information in element #2(d).
4. Timeliness of Initial Permits (PART element)	a) Total number of initial part 70 permits issued during 6 month reporting period: 0	<ul style="list-style-type: none"> • This data element tracks the initial part 70 permits issued as final (e.g., not draft or proposed) during the 6 month reporting period covered by this report, and whether they were issued within 18 months of receipt of an administratively complete application. • For TOPS purposes, initial permits are permits that are issued to any source that has become subject to part 70 for the first time, or any source that comes back into the part 70 program after a period of not being subject. • If no initial permits were issued during the 6 month reporting period, report "zero" in 4(b), and "not applicable" in 4(a).
	b) Number of initial part 70 permits finalized during 6 month reporting period that were issued within 18 months: not applicable	<ul style="list-style-type: none"> • Start the 18-month clock on the submittal date of an administratively complete application. For purposes of this data element, do not stop or restart the 18 month clock for additional information submitted after the application is deemed administratively complete. • For permitting authorities that issue multiple part 70 permits to a single source and included information in 2(d), count each permitted portion of the source separately for this element. This distinction is for determining individual permit timeliness.

5. Total Outstanding Initial Part 70 Applications	<p>The number of active initial part 70 applications older than 18 months:</p> <p>2</p>	<ul style="list-style-type: none"> • This element tracks <u>all</u> active, administratively complete <u>initial</u> part 70 permit applications that the permitting authority has not taken final action on within 18 months of receipt of the administratively complete application. Do not stop or restart the 18 month clock for additional information submitted after the application is deemed administratively complete. • For TOPS purposes, initial part 70 applications are applications for sources that are subject to title V for the first time, or for any source that comes back into the title V program after a period of not being subject. Do <u>not</u> include renewal applications. • Include all current outstanding initial applications, including those that may also be tracked in data element #1. • Do <u>not</u> count initial applications the Permitting Authority has taken final action on.
6. Outstanding Renewal Permit Actions	<p>a) Total number of expired permits for active part 70 sources:</p> <p>0</p>	<ul style="list-style-type: none"> • This data element tracks the total number of expired permits for active part 70 sources. Part 70 permits expire after 5 years if the sources do not submit timely and complete renewal applications, or if they have lost their application shield by not timely responding to additional requests for information. • Include expired permits that have been addressed through consent orders or other enforcement mechanisms. Expired permits can be further addressed in the "Additional Information" element. • Do <u>not</u> include permits that have expired because the source is no longer subject to Title V; i.e., they have shutdown or have received synthetic minor restrictions. <p>For permitting authorities that issue multiple part 70 permits to a single source and included information in 2(d), count each expired permit separately.</p>

Outstanding Renewal Permit Actions (Continued)	b) Total number of active permits with terms extended past 5 years: 4	<ul style="list-style-type: none">• This data element tracks the total number of active permits that have been extended past the original 5 year permit term. Part 70 permits or permit conditions are extended beyond the original 5 year term when sources submit a timely and complete renewal application (and any timely and complete additional information requested by the permitting authority), but the permitting authority has not yet issued a renewal permit.• Count all extended permits, including extended permits for sources that submitted timely and complete renewal applications within the last 18 months. Pending applications that are less than 18 months old can be further addressed in the "Additional Information" element.• Do <u>not</u> include inactive extended permits, i.e., when a subsequent permit renewal has been issued or a source is no longer subject to part 70.• Do <u>not</u> include "expired part 70 permits" that have been addressed through consent orders or other enforcement mechanisms. Count expired permits in 6(a).• For permitting authorities that issue multiple part 70 permits to a single source and included information in 2(d), count each extended permit separately.
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7. Timeliness of Significant Modifications (PART element - a and b only)	<p>a) Total number of significant modifications issued during 6 month reporting period:</p> <p>0</p> <p>b) Number of significant modifications finalized during 6 month reporting period that were issued within 18 months:</p> <p>not applicable</p> <p>c) Number of significant modifications finalized during 6 month reporting period that were issued within 9 months:</p> <p>not applicable</p>	<ul style="list-style-type: none"> • This data element tracks the number of significant modifications issued as final (e.g., not draft or proposed) during the 6 month reporting period. It also tracks the number of those modifications that were issued within 18 months of receipt of an administratively complete significant modification application, and also the number that were issued within 9 months. Note that 7(c) is a subset of 7(b). • If no significant modifications were issued during the 6 month reporting period, report "zero" in 7(a) and "not applicable" in 7(b) and 7(c). • Start the application clock on the submittal date of an administratively complete significant modification application. Do not restart the clock for additional information submissions.
8. Outstanding Significant Permit Modifications	<p>Total number of active significant modification applications older than 18 months:</p> <p>0</p>	<ul style="list-style-type: none"> • This element tracks all active, administratively complete significant permit modification applications that the permitting authority has not taken final action on within 18 months of receipt of the administratively complete application. • Do not stop or restart the 18 month clock for additional information submitted after the application is deemed administratively complete. • Do <u>not</u> count significant modification applications the Permitting Authority has taken final action on.
9. Comments and Additional Information	<p>Two synthetic minor sources each submitted a complete initial Part 70 permit application in December 2013, as required by 40 CFR 63 Subpart VVVVV. Neither source has yet been issued a Part 70 permit.</p> <p>The four sources with extended Part 70 permits submitted complete renewal Part 70 permit applications in June 2013, January 2014, March 2014, and October 2014, respectively.</p>	<p>Permitting authorities may provide any additional information in this section. For example, a permitting authority may address data changes, data management issues, general permits, multiple permits issued to single stationary sources, synthetic minor information, additional relevant data, etc.</p>



**Region 4 - Air Planning Agreement
For Fiscal Year 2016
** Draft ****

**Agency: Chattanooga-Hamilton County Air Pollution Control Bureau
View Portions of the Workplan**

Improving Air Quality*

Goal: 1: Addressing Climate Change and Improving Air Quality

Objective: 1.2: Improve Air Quality. Achieve and maintain health- and welfare-based air pollution standards and reduce risk from toxic air pollutants and indoor air contaminants.

Sub-Objective: Reduce Criteria Pollutants and Regional Haze

- Strategic Targets:**
- By 2018, the population-weighted average concentrations of ozone (smog) in all monitored counties will decrease to 0.072 ppm compared to the average of 0.076 ppm in 2011, a reduction of 5 percent.
 - By 2018, the population-weighted average concentrations of inhalable fine particles in all monitored counties will decrease to 9.5 µg/m³ compared to the average of 10.4 µg/m³ in 2011, a reduction of 9 percent.
 - Through 2018, maintain emissions of sulfur dioxide (SO₂) from electric power generation sources to 5.0 million tons per year compared to the 2009 level of 5.7 million tons emitted. (In 2011, these sources emitted 4.5 million tons.)
 - By 2018, visibility in scenic parks and wilderness areas will improve by 15 percent in the East and 5 percent in the West, on the 20 percent worst visibility days, as compared to visibility on the 20 percent worst days during the 2000-2004 baseline.
 - By 2018, with EPA support including training, policy, and administrative and technical assistance, tribes will receive 15 additional approvals to implement the Clean Air Act in Indian country (as demonstrated by successful completion of an eligibility determination under the Tribal Authority Rule). The cumulative total will be 62 approved eligibility determinations, from the 2012 baseline of 47.

* Information from EPA's 2014-2018 Strategic Plan at <http://www2.epa.gov/planandbudget/strategicplan>.

FY 2016 105 Grant Commitments:

NAAQS Cross Cutting

1. Continue to develop and implement standards, plans, strategies, and actions to preserve air quality in attainment areas and prevent further degradation in areas with the potential to be designated nonattainment in the future. Continue screening of monitoring data for early indication of nonattainment. For areas that violate after the designation, work with Region 4 to develop a plan to expeditiously bring each area back into attainment.

Response: Yes

2. Consistent with the national allocation of section 105 grant resources and the states' and locals' voluntary withholding of 105 grant resources for special projects, continue developing

regional planning capabilities for National Ambient Air Quality Standards (NAAQS) and regional haze, including emission inventory development, building air quality modeling capacity, other technical analyses and collaboration with other agencies. The state and local contact or section chief in the Air Regulatory Management Section should be notified, at the mid-year point and a month prior to the end of the grant period, via e-mail of how the state or local agency is meeting this grant condition, specifying applicable specific grants or programs.

Response: Yes. Will follow the States lead in this matter. Will cooperate with the state as might be required.

Implement Mobile Source Programs

3. Actively participate in the transportation conformity process, which includes the following activities: consult with appropriate transportation and air quality partners on development of motor vehicle emissions budgets; participate in the interagency consultation process; and develop relationships with transportation partners.

Response: Yes, to the extent that personnel and funding will allow.

Implement NSR Programs

4. Issue major NSR/Prevention of Significant Deterioration (PSD) permits and minor source permits that comply with CAA requirements and enter Best Achievable Control Technology (BACT)/Lowest Achievable Emissions Rate (LAER) determinations for major sources in the Reasonably Achievable Control Technology (RACT)/BACT/LAER Clearinghouse (RBLC).

Response: Yes

5. Upon receipt of an NSR/PSD permit application for a major source, submit a copy to EPA. If your agency has a completeness determination process, notify EPA when each NSR/PSD permit application is deemed complete. Upon public notice of a draft NSR/PSD permit for a major new source of modification, submit a copy to EPA of any documents relevant to the preliminary determination and draft NSR/PSD permit. Upon issuance of a final major source permit, submit a copy to EPA of any documents relevant to the final determination and final permit.

Response: Yes

Ambient Air Monitoring

6. Operate all criteria pollutant monitors and perform requisite data review and quality assurance/quality control elements in compliance with the requirements of the CFR and other applicable federal policy and guidance. This commitment includes all reporting and data certification requirements (e.g., annual State and Local Air Monitoring Station (SLAMS) reports and data certifications due by May 1 each year). The agency will collect strip chart data or its electronic equivalent for quality assurance purposes. Electronic strip chart data must be collected on a 1 minute timeframe or less. This data must be retained for a minimum of three (3) complete monitoring years.

Response: Yes

7. The State will develop and submit for approval a statewide ambient monitoring network plan. The network plan should be consistent with requirements outlined in 40 CFR Parts 50, 53, and 58. Local agencies will coordinate with the State in the development of this plan. The annual network plan is to be submitted on or by July 1 of each year incorporating any changes, real or proposed. Include in the annual ambient monitoring network design plan a certified evaluation of the agency's ambient monitors and auxiliary support equipment and categorize the condition of the equipment as "Good," "Fair," or "Poor." Please indicate which equipment pieces are not in everyday use (e.g., spare/back-up equipment stored in a lab or warehouse.) Auxiliary equipment includes items such as calibrators, data loggers, meteorological equipment, modems, etc. The agency is requested to replace equipment categorized as "Poor."

Response: Yes

8. Maintain an approved Quality Management Plan (QMP) for activities involving the collection and use of air quality environmental data. Locals must coordinate with the State. The QMP will be submitted at least 60 days prior to the expiration of the current QMP and address EPA Requirements for Quality Management Plans (EPA QA/R-2, <http://www.epa.gov/quality/qs-docs/r2-final.pdf>). For additional information and guidance see <http://www.epa.gov/quality/qmps.html>.

Response: Yes, as personnel allows.

9. State and local agencies will review and update their quality assurance project plans (QAPPs) for their respective criteria pollutant networks, as appropriate, and submit modifications to EPA prior to modifying their networks. All QAPPs should be reviewed at least once every five years. If no changes are necessary, the agency is required to resubmit the existing QAPP stating that it has been reviewed and no changes were required.

Response: Yes, as personnel allows. QAPP changes are dependent on EPA's approval of submitted QA and SOP documents.

10. For all new pollutants to be monitored and methods to be used during the fiscal year, submit a revised quality assurance project plan three months prior to collection of environmental data.

Response: Yes

11. Review and update quality assurance procedures, if needed, to reflect current/revised Federal quality assurance requirements. Local agencies will coordinate Standard Operating Procedures (SOP) changes through the State. If changes or revisions are anticipated, submit the following information electronically to r4sesdairqa@epa.gov or in hard copy to EPA Region 4's Science and Ecosystems Support Division (SESD), Superfund and Air Section, 980 College Station Road, Athens, Georgia 30605.

A. Revisions to current SOPs as they are completed, and

B. SOPs for new monitoring and ancillary equipment used in the SLAMS network six months after equipment is installed.

Response: Yes, as personnel allows.

12. For all SLAMS and Special Purpose Monitors (SPMs) meeting the requirements of 40 CFR 58, notify EPA as soon as possible, but no later than 30 days, after the determination of exceedances/violations of the NAAQS for all criteria pollutants, including PM_{2.5}. For the 8 hour ozone NAAQS, report all 4th maximum concentrations that are at or above the level of the standard (agencies meet this commitment for monitors whose data are reported to AIRNow).

Response: Yes. Data is reported to AIRNow.

13. Comply with the requirements in 40 CFR Section 50.14 regarding treatment of data influenced by exceptional events. (Note: EPA Region 4 will neither review nor concur on either State or Local requests to exclude data unless the State is in compliance with the appropriate requirements.)

Response: Yes

14. In conjunction with the AQI, agencies are encouraged to submit an Air Quality Forecast for MSA's greater than 350,000 people to the EPA AIRNow Web site. The air quality forecast should be submitted daily to the AIRNow Web site before 3:55 p.m. EDT. The Air Quality Forecast, like the AQI, will be based on the primary criteria pollutant. Unlike the AQI, an index value is not required to be reported as a forecast; instead of the index value, the AQI descriptor value of Good, Moderate, Unhealthy for Sensitive Groups, Unhealthy, or Very Unhealthy should be used.

Response: The State of Tennessee forecasts for Chattanooga-Hamilton County.

15. Support staff participation at the following meetings:
 - A. The Region 4 Ambient Air Monitoring Work Shop; and
 - B. The National Ambient Air Monitoring Conference.

Response: Yes, as personnel and funding are available.

16. SLAMS data for each criteria pollutant monitor must be at a minimum 75% complete on a quarterly and annual basis. Additionally, ozone data must be 90% or more complete on a three year average basis. Notify EPA immediately if a problem arises that will prevent the agency from meeting a data completeness requirement for any pollutant. Provide reasons why the data completeness requirement will not be met, a schedule for correcting the problem, and corrective actions that will be taken to avert the problem from recurring. Notify EPA by mail or e-mail no more than 45 days after the end of the quarter of any monitor not meeting the 75% data recovery requirement. Data recovery may become part of a regional/national statistical report published by EPA.

Response: Yes

Reduce Air Toxics*

Goal: 1: Addressing Climate Change and Improving Air Quality

Objective: 1.2: Improve Air Quality. Achieve and maintain health- and welfare-based air pollution standards and reduce risk from toxic air pollutants and indoor air contaminants.

Sub-Objective: Reduce Air Toxics

Strategic Targets:

- Through 2018, maintain air toxics (toxicity-weighted for cancer) emissions reductions to 4.2 million tons from the 1993 toxicity-weighted baseline of 7.2 million tons.
-

* Information from EPA's 2014-2018 Strategic Plan at (<http://www2.epa.gov/planandbudget/strategicplan>).

FY 2016 105 Grant Commitments:

1. Collect ambient air quality data for toxics from monitoring sites as appropriate for special studies funded under this agreement. Include any planned air toxics monitoring in the ambient monitoring network design plan that is submitted to EPA in July annually. If no monitoring is planned, respond to this commitment by stating, "No air toxics monitoring will be performed."
Response: No air toxics monitoring will be performed.
2. Ensure that the QA/QC procedures for air toxics monitoring and lab analysis, including necessary quality assurance project plans (QAPPs) and standard operating procedures (SOPs), are submitted (in hardcopy and electronic format) to the Region 4 Quality Assurance Coordinator and the Technical Project Officer for review, approval, and inclusion into the agency's quality management plan (QMP). If no monitoring is planned respond to this commitment by stating, "No air toxics monitoring will be performed."
Response: No air toxics monitoring will be performed.
3. If applicable, encourage laboratories conducting analyses for air toxics to participate in any available national or regional inter-laboratory proficiency testing programs and audits and make identified modifications to enhance data quality.
Response: Not Applicable.
4. If applicable, enter quality assured and associated QA/QC data into the AQS database system no later than 120 days from the end of the quarter for all ambient air toxics monitoring data collected.
Response: Not Applicable.
5. Assume delegation and implementation of all promulgated Clean Air Act Section 112, 111, and 129 rules and standards [National Emission Standard for Hazardous Air Pollutant (NESHAP), and New Source Performance Standards (NSPS)] within 9 to 12 months of EPA's promulgation, as appropriate, if a rulemaking is required to take delegation via the Agency's CAA Title V approval process. Notify Region 4 by submitting rule adoption documentation within 60 days of adoption.

Response: Yes, Will adopt new and changed NESHAPS, MACT Standards, Residual Risk Rules, Area Source Standards and NSPS as funding and staffing permits.

6. Work towards establishing the programmatic expertise to address the risk-based components of Clean Air Act sections 112, 111, and 129, by pursuing risk training when appropriate.

Response: Yes. The Bureau has an on-going program.

7. Make case-by-case MACT determinations for all applicable sources under CAA, section 112 (g) including appropriate compliance monitoring measures, and copy EPA Region 4 on all final 112(g) determinations.

Response: Yes

8. Maintain a record of all approved alternatives to monitoring, testing, recordkeeping, and reporting requirements made for sources subject to MACT standards and report number of requests processed semi-annually (this is required by rule; see 40 CFR Part 63.91(g)(1)(ii)).

Response: Yes

9. Prepare and submit CAA sections 111(d) and 129 state plans and letters of certification in accordance with regulatory timeframes. In addition, collect and submit reports on progress of sections 111(d) and 129 plans annually, pursuant to 40 CFR 60.25(e) and (f).

Response: Yes. Will adopt rules if any such source(s) locates in this jurisdiction.

Monitoring and Enforcement*

Goal: 5: Protecting Human Health and the Environment by Enforcing Laws and Assuring Compliance

Objective: 5.1: Enforce Environmental Laws to Achieve Compliance. Pursue vigorous civil and criminal enforcement that targets the most serious water, air, and chemical hazards in communities to achieve compliance. Assure strong, consistent, and effective enforcement of federal environmental laws nationwide. Use Next Generation Compliance strategies and tools to improve compliance and reduce pollution.

Sub-Objective: Support Addressing Climate Change and Improving Air Quality

Strategic Targets:

- By 2018, reduce, treat, or eliminate 1,590 million estimated pounds of air pollutants as a result of concluded enforcement actions (5-year cumulative). (FY 2005-2008 baseline: 480 million pounds, annual average over the period. Status for FY 2013: 610 million pounds.)
-

* Information from EPA's 2014-2018 Strategic Plan at
(<http://www2.epa.gov/planandbudget/strategicplan>).

FY 2016 105 Grant Commitments:

1. Ensure enforcement and compliance monitoring is consistent with the Compliance Monitoring Strategy Policy revised and reissued on July 14, 2014, The Timely and Appropriate Enforcement Response to High Priority Violations Policy revised and reissued on August 25, 2014. Ensure complete, accurate and timely data support of the Integrated Compliance Information System (ICIS-Air).

Response: Yes

2. Resolve violations of any rule for which EPA has delegated authority to the state or local agency. Federally Reportable Violations should be reported to ICIS-Air in accordance with the Guidance on Federally-Reportable Violations for Clean Air Act Stationary Sources revised and reissued on September 23, 2014.

Response: Yes

3. Inspect 25% of all NESHAP asbestos demolition/renovation projects. These projects should be selected so that all removal contractors are inspected at least once. Alternatively, lower inspection rates can be negotiated if an effective contractor certification program is in place. Lower inspection rates can also be negotiated if a non-notifier strategy is developed and implemented.

Response: Yes. Will inspect at least 25% of all NESHAP asbestos demolition/renovation projects.

4. Observe asbestos work practices in progress whenever possible to assess compliance. Special priority will be given to entering a project of a contractor with a work practice violation within the previous 12-month period.

Response:

We will request the assistance of EPA Region 4 if the Bureau Director deems it necessary to enter the containment area to evaluate compliance.

5. ACTS/NARS database is no longer available. Report the following asbestos NESHAP activities at least forty-five (45) days after each fiscal **six-month period** 1) number of notifications received; 2) number of inspections; 3) non-notifier activity if applicable; 4) number of non-penalty enforcement actions; 5) number of enforcement actions with an assessed penalty; and 6) total penalty assessment.

Response: Yes

6. Maintain a State/Local health and safety plan for asbestos demolition/renovation inspectors. Plan to include medical monitoring, protective equipment, and training as minimum requirements. Alternatively, implement EPA's "Health and Safety Guidelines for EPA Asbestos Inspectors," dated March 1991. These documents will be reviewed by EPA during state program visits.

Response: Yes. Health evaluations are available at the City Wellness as provided for inspectors.

7. Recommend (where appropriate) cases and provide support to the EPA Criminal Enforcement Program.

Response: Yes

Cross Cutting Issues

Goal: 1 and 5: Addressing Climate Change and Improving Air Quality, and Protecting Human Health and the Environment by Enforcing Laws and Assuring Compliance

Objective: See all objectives listed in this agreement.

Sub-Objective: See all strategic targets listed in this agreement.

Strategic Targets: • See all strategic targets listed in this agreement.

FY 2016 105 Grant Commitments:

Emission Inventories - Hazardous Air Pollutants

1. Review 2011 National Air Toxic Assessment (NATA) results during FY 15 and make revisions to your agency's inventory. Support the Emission Inventory System (EIS) in reporting the 2014 National Emissions Inventory (NEI) for hazardous air pollutants. The EPA requests that state, local, and tribal air agencies submit emissions information updates for major point sources to EIS database annually or as requested by the EPA Office of Air Quality Planning and Standards. Information on the EIS Gateway can be found at: <http://www.epa.gov/ttn/chief/eis/gateway/index.html>. The state and local contact in the Air Data and Analysis Section should be notified via e-mail when the 2014 submittal is made to EPA.

Response: Yes

Emission Inventories - Criteria Air Pollutants

2. Develop and submit to EPA, emissions inventory information for all applicable point sources, CAP pollutants and time frames consistent with the Air Emissions Reporting Requirements (AERR) Rule published in the December 17, 2008; 73 Federal Register 76539 and any clarifying or updated policy. The 2014 CAPs point source emissions inventories should be submitted to EPA Headquarters through the Emissions Inventory System (EIS) Gateway no later than January 15, 2016. Early submittals are recommended. Information on the EIS Gateway can be found at: <http://www.epa.gov/ttn/chief/eis/gateway/index.html>. Notify the state and local NEI/NATA contact in the Air Data and Analysis Section via email when the 2014 submittal is made to the EIS.

Response: Yes

Planning

3. Submit a draft Air Planning Agreement for FY 2016 by August 1, 2015, respectively, by responding to the commitments on the internet-based draft workplan.

Response: Yes

4. Participate with EPA in an end of year evaluation of performance to be completed by February 15, 2017. This evaluation will be based on an annual summary report submitted by the agency by December 31, and on progress reports received throughout the year. In accordance with 40 CFR 35.115 and the EPA Policy on Managing Unliquidated Obligations and Ensuring Progress under EPA Assistance Agreements, the joint evaluation process will include:
 - A. discussions of accomplishments as measured against work plan commitments;
 - B. discussions of the cumulative effectiveness of the work performed under all work plan components;
 - C. discussions of existing and potential problem areas;
 - D. suggestions for improvement, including, where feasible, schedules for making improvements; and
 - E. discussions of how effectively grant funds were managed and utilized, taking into account any accumulation of unliquidated obligations.

Response: Yes

Agency Expectations of EPA (optional)

5. Enter Agency's expectations of EPA (i.e., assistance needed from EPA to meet the commitments under this Air Planning Agreement).

Response: Additional manpower and funding is most certainly required.

Return to Air Planning Agreement Program
--

Quality Assurance Documentation

And

Certification of Competency

(This checklist is to be filled out and signed by the Grantee, and provided to the Grant Project Officer, and is intended to be used for demonstrating competency on new grant awards & for on-going annual competency demonstration submittals)

1) Quality Assurance Documentation: If the grantee's project involves environmentally related measurements or data generation, the grantee shall develop and implement quality assurance practices consisting of policies, procedures, specification, standards, and documentation sufficient to produce data of quality adequate to meet project objectives and to minimize loss of data due to out-of-control conditions or malfunctions per 2 CFR Part 1500.11.

☐ This program/project does not involve environmentally related measurements or data generation; therefore, a Quality Management Plan (QMP)/Quality Assurance Project Plan (QAPP) is not required pursuant to the above referenced assistance regulations.

☒ This program/project involves environmentally related measurements or data generation; therefore a QMP/QAPP has been developed and submitted to the EPA or will be developed before field work begins that meets the requirements of 2 CFR 1500.11.

2) Certification of Competency: The Competency Policy (FEM-2012-01) effective October 1, 2013, requires organizations generating or using environmental data under Agency-funded assistance agreements >200K to submit documentation of their competency prior to award of the agreement or if not practicable, prior to beginning any work involving the generation or use of environmental data. There are a number of QA/QC activities already in place to ensure that organizations receiving federal funding are competent to perform environmental sampling, field measurements, and/or laboratory analyses compliant with the Forum on Environmental Measurements (FEM) Policy requirements.

Examples of documentation of competency can include the following: (Please check **one or more** of the appropriate blocks which best describe the nature/extent of your overall QA system. As applicable, please provide the appropriate suggested documentation as an attachment to this checklist.)

☒ Cooperative Agreements/Grants – By checking this item, the grantee is acknowledging awareness of the terms and conditions listed on the grant/cooperative agreement which address QA requirements for the grant.

☐ Participation in Certification Programs (e.g., NELAC, ISO) for laboratory or field activities, or if you are considering pursuing certifications in the future – If your Organization has certification(s), *please provide as documentation **copies of the certificates and the date of the certification**. If your Organization is considering pursuit of a certification, please provide details of your planning for this recognition. As part of certification, certain activities are already included (e.g., participation in proficiency testing programs; developed laboratory QA manuals and standard operating procedures, etc.). If accreditation/certification status changes any time during the period of performance, the US EPA project officer should be notified immediately.*

☐ Participation in an external proficiency testing (PT) program (independent of external programmatic certifications (e.g., laboratory)) – *If applicable, please provide as an **attachment** to this document a tabular listing of proficiency testing programs/dates (e.g., different laboratory monitoring*

program/activities) that your organization participated in during the time period addressed by this QA documentation competency report.

☒ Quality documentation such as Laboratory Quality Assurance Manuals/Standard Operating Procedures (SOPs) (independent of external programmatic certifications (e.g., laboratory)) – *Please include information about the frequency that the manual and/or SOPs are reviewed/updated, and the date of the last review. All QA SOPs were updated and submitted to EPA SEDS in 2014 and early 2015. SOPs for PM2.5, Ozone, and Data Handling were approved. Lists are maintained of changes in SOPs, and the SOPs are resubmitted to EPA for major changes. The SOPs are constantly being reviewed, at least once a year. The Bureau began in 2017 operating a Teledyne T640, and is submitting an SOP to EPA in August 2017.*

☒ Audit Results (periodic management systems reviews of QA system, laboratory audits and/or technical audits) – *During the time period addressed by this QA documentation competency report, please provide dates that the audit(s) was/were performed and a summary of the findings as an attachment to this checklist.*

☒ EPA approved QMP's/QAPPs

QMP approved date: 12/5/2012 expiration date: 12/5/2017

QAPP approved date: 4/23/2007 expiration date: New QAPP submitted 11/18/2015. EPA returned requests for corrections. The T640 was added to the network in 2017. Resubmittal of the QAPP will be after the T640 SOP and QMP submittals to EPA- in late 2017 or early 2018. The T640 submittal is projected to be in August 2017, and the QMP in early November 2017.

☐ If multiple QMP(s)/QAPPs are included as part of your QA system, then please provide as an attachment to this checklist a tabular listing of the documents included as part of the QA system for your Organization (i.e., title/approval dates for QMP(s) and QAPPs).

As part of your approved QMP(s)/QAPP(s), your plan must include information about the qualifications of your staff and ongoing QA training of your personnel, that there is an established and documented QA/QC system, and that there is a Quality Assurance Officer responsible for overseeing implementation of your QA/QC program.

☒ Use of third party certified labs (sometimes included in QMPs, but not always) – *If applicable, please provide the name of third party lab and the program/activities/analysis/contaminant that the third party lab is responsible for performing. Inter-Mountain Labs, Sheridan, Wyoming, for PM2.5 filter weighing*

☐ Other – *If applicable, please provide as an attachment to this checklist a tabular list of the other activities not specifically mentioned in this checklist that your Organization considers to be part of your QA system.*

This Quality Assurance Documentation and Certification of Competency will be maintained in the grant file as required. For each New Award a new form will need to be submitted to the EPA Project Officer with the application and workplan and annually thereafter with a timeline determined by the EPA Program Office.

3) Grantee Authorization: The grant recipient authorizes to the best of their knowledge that the above information is accurate and complete. *(Type in Name, Date, Organization and Grant number. Print the document, initial next to your name and send to EPA Grant Project Officer.)*

Authorized (Assistant Agreement) Representative Kathy Jones/Jim Holloway

Date 8 - 18 - 2017

Agency Chattanooga-Hamilton Co. Air Pollution Control Bureau

Grant Number, if known A - 00408415

4) EPA Grant Project Officer: (Acknowledge document receipt and place in the grant file following review/approval.)

Grant Project Officer: _____ Date: _____

QA Documentation and Certification of Competency Addendum
FY 2016-2017 Grant 00408415
Chattanooga-Hamilton County Air Pollution Control Bureau

Summary of EPA TSA Findings

EPA performed a TSA in November 2015. There were no major findings.

Summary of State of Tennessee Audits

Since the PM_{2.5} Grant has a different grant year from the 105, this evaluation is from the beginning of the PM_{2.5} grant year.

***Note: the State of Tennessee began auditing the compartment temperature sensors in December 2015. The PM_{2.5} FRM program began January 1, 1999. The newest version of the FRM monitor (2025i) does not have a compartment temperature sensor.*

Grant Quarter 3: April 1-June 30, 2016- Performed June 21

Findings: Compartment temperature on SN20781 at Siskin Drive (470654002) was 1.7° out of limits.

Response: Compartment temperature sensor was replaced.

Grant Quarter 4: July 1-September 30, 2016 – Performed September 19

Findings: Compartment temperature on SN20772 for East Ridge (470650031) was 7.3° out of limits. Audit on September 19 on 20775 at Siskin Drive 470654002 failed external and internal leak checks.

Response: Compartment temperature sensor was replaced for SN 20772. Maintenance was performed on SN20775, the auditor returned, and the monitor passed all leak checks on September 20th.

Grant Quarter 1: October 1, 2016-December 31, 2016-Performed November 30 and December 1

Findings: The compartment temperature on Siskin Drive 470654002(SN20781- POC 1) was on the border of the acceptable range.

Response: No record in the log book of a response.

Grant Quarter 2: January 1, 2017-March 31, 2017- Performed March 22

Findings: At the East Ridge site 470650031 (SN20772) and Siskin Drive 470654002 (SN20781-POC 1) the compartment temperatures were over 2° different (.7° and .8° low).

Response: The temperature sensors were recalibrated.

Grant Quarter 3: April 1, 2017-June 30, 2017- Performed June 13

No Findings.

Application for Federal Assistance SF-424

* 1. Type of Submission:

- ☐ Preapplication
☒ Application
☐ Changed/Corrected Application

* 2. Type of Application:

- ☐ New
☒ Continuation
☐ Revision

* If Revision, select appropriate letter(s):

* Other (Specify):

* 3. Date Received:

4. Applicant Identifier:

5a. Federal Entity Identifier:

5b. Federal Award Identifier:

State Use Only:

6. Date Received by State:

7. State Application Identifier:

8. APPLICANT INFORMATION:

* a. Legal Name: Chattanooga-Hamilton County Air Pollution Control Bureau

* b. Employer/Taxpayer Identification Number (EIN/TIN):

62-6000259

* c. Organizational DUNS:

1374695520000

d. Address:

* Street1:

6125 Preservation Drive, Suite 140

Street2:

* City:

Chattanooga

County/Parish:

* State:

TN: Tennessee

Province:

* Country:

USA: UNITED STATES

* Zip / Postal Code:

37416-3740

e. Organizational Unit:

Department Name:

Division Name:

f. Name and contact information of person to be contacted on matters involving this application:

Prefix:

Mrs.

* First Name:

Kathy

Middle Name:

M.

* Last Name:

Jones

Suffix:

Title: Air Monitoring Manager

Organizational Affiliation:

* Telephone Number: (423) 643-5980

Fax Number: (423) 643-5972

* Email: jones_kathy@chattanooga.gov

Application for Federal Assistance SF-424

*** 9. Type of Applicant 1: Select Applicant Type:**

B: County Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

*** 10. Name of Federal Agency:**

US Environmental Protection Agency

11. Catalog of Federal Domestic Assistance Number:

66.034

CFDA Title:

*** 12. Funding Opportunity Number:**

EPA-CEP-01

* Title:

13. Competition Identification Number:

Title:

14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment

Delete Attachment

View Attachment

*** 15. Descriptive Title of Applicant's Project:**

PM2.5 Monitoring Program
Number 66.034

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

Application for Federal Assistance SF-424

16. Congressional Districts Of:

* a. Applicant

* b. Program/Project

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment

Delete Attachment

View Attachment

17. Proposed Project:

* a. Start Date:

* b. End Date:

18. Estimated Funding (\$):

* a. Federal	<input type="text" value="130,000.00"/>
* b. Applicant	<input type="text"/>
* c. State	<input type="text"/>
* d. Local	<input type="text"/>
* e. Other	<input type="text"/>
* f. Program Income	<input type="text"/>
* g. TOTAL	<input type="text" value="130,000.00"/>

* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?

- ☐ a. This application was made available to the State under the Executive Order 12372 Process for review on
- ☐ b. Program is subject to E.O. 12372 but has not been selected by the State for review.
- ☐ c. Program is not covered by E.O. 12372.

* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)

☐ Yes ☒ No

If "Yes", provide explanation and attach

Add Attachment

Delete Attachment

View Attachment

21. *By signing this application, I certify (1) to the statements contained in the list of certifications** and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)

☒ ** I AGREE

** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:

Prefix: * First Name:

Middle Name:

* Last Name:

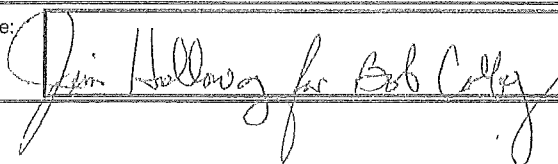
Suffix:

* Title:

* Telephone Number: Fax Number:

* Email:

* Signature of Authorized Representative:



* Date Signed:

BUDGET INFORMATION - Non-Construction Programs

OMB Number: 4040-0006
Expiration Date: 06/30/2014

SECTION A - BUDGET SUMMARY

Grant Program Function or Activity (a)	Catalog of Federal Domestic Assistance Number (b)	Estimated Unobligated Funds		New or Revised Budget		
		Federal (c)	Non-Federal (d)	Federal (e)	Non-Federal (f)	Total (g)
1. PM2.5 Monitoring Program 2015 - 2016	66.034	\$ 130,000.00		\$ 130,000.00		\$ 130,000.00
2.						
3.						
4.						
5. Totals		\$ 130,000.00		\$ 130,000.00		\$ 130,000.00

SECTION B - BUDGET CATEGORIES

6. Object Class Categories	GRANT PROGRAM, FUNCTION OR ACTIVITY				Total (5)
	(1)	(2)	(3)	(4)	
	PH2.5 Monitoring Program 2015 - 2016				
a. Personnel	\$ 64,785.00	\$	\$	\$	\$ 64,785.00
b. Fringe Benefits	25,914.00				25,914.00
c. Travel	1,827.00				1,827.00
d. Equipment	0.00				
e. Supplies	17,774.00				17,774.00
f. Contractual	0.00				
g. Construction	0.00				
h. Other	19,700.00				19,700.00
i. Total Direct Charges (sum of 6a-6h)	130,000.00				\$ 130,000.00
j. Indirect Charges	0.00				\$
k. TOTALS (sum of 6i and 6j)	\$ 130,000.00	\$	\$	\$	\$ 130,000.00
7. Program Income	\$ 0.00	\$	\$	\$	\$

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Prescribed by OMB (Circular A -102) Page 1A

SECTION C - NON-FEDERAL RESOURCES				
(a) Grant Program	(b) Applicant	(c) State	(d) Other Sources	(e) TOTALS
8. PM2.5 Monitoring Program	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00
9.				
10.				
11.				
12. TOTAL (sum of lines 8-11)	\$	\$	\$	\$

SECTION D - FORECASTED CASH NEEDS					
	Total for 1st Year	1st Quarter	2nd Quarter	3rd Quarter	4th Quarter
13. Federal	\$ 130,000.00	\$ 32,500.00	\$ 32,500.00	\$ 32,500.00	\$ 32,500.00
14. Non-Federal	\$				
15. TOTAL (sum of lines 13 and 14)	\$ 130,000.00	\$ 32,500.00	\$ 32,500.00	\$ 32,500.00	\$ 32,500.00

SECTION E - BUDGET ESTIMATES OF FEDERAL FUNDS NEEDED FOR BALANCE OF THE PROJECT				
(a) Grant Program	FUTURE FUNDING PERIODS (YEARS)			
	(b) First	(c) Second	(d) Third	(e) Fourth
16. PM2.5 Monitoring Program	\$ 130,000.00	\$	\$	\$
17.				
18.				
19.				
20. TOTAL (sum of lines 16 - 19)	\$ 130,000.00	\$	\$	\$

SECTION F - OTHER BUDGET INFORMATION	
21. Direct Charges:	22. Indirect Charges: 0
23. Remarks:	

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Standard Form 424A (Rev. 7- 97)
Prescribed by OMB (Circular A -102) Page 2

BUDGET JUSTIFICATION WORKSHEET

You must provide a detailed cost justification for the estimated budget amounts reflected in Section B of your SF-424A application form. This detailed information will enable the EPA project officer to perform the required analysis to determine if the costs are reasonable and necessary. You may use the following format or a format of your choice to provide this information.

[NOTE: Please indicate any pre-award costs with a star (*).]

a. PERSONNEL

POSITION	NUMBER	SALARY	WORK YEARS	AMOUNT
Air Monitoring Manager	1	\$63,229.00	0.4139	\$26,173.00
Air Monitoring Technician	1	40,644.00	0.950	38,612.00
a. PERSONNEL TOTAL				\$64,785.00

b. FRINGE BENEFITS (Executive Director only)

BASE (FTE for years 1 & 2 of Grant)	\$64,785.00
	X .40
b. FRINGE BENEFITS TOTAL	\$25,914.00

c. TRAVEL

If the grant is not for a continuing environmental program or if travel is not well documented in the work plan, provide a breakdown of the number of trips, destinations, number of travelers, etc. to document estimated travel costs.

One employee to Region IV Air Monitoring Workshop (Athens, GA) \$ 617.00
(Hotel - \$345, Meals - \$172, Other - \$100)

One employee to National Air Monitoring Conference (Atlanta, GA) \$1,210.00
(Hotel - \$500, Meals - \$260, Other - \$100)

c. TRAVEL TOTAL: \$1,827.00

OBJECT CLASS CATEGORIES WORKSHEET

d. EQUIPMENT

Tangible, non-expendable, personal property having a useful life of more than one year and an acquisition cost of \$5,000 or more per unit. Please list equipment items (i.e., vehicles, boats, etc.) and provide adequate detail to enable the EPA project officer to make an eligibility determination and to verify cost. For "equipment" with a cost of less than \$5,000 per unit, list under supplies.

ITEM	NUMBER	COST PER UNIT	TOTAL
d. EQUIPMENT TOTAL:			\$0.00

e. SUPPLIES

List by groups (as appropriate), such as office supplies, lab supplies, field supplies. If the cost for a particular group is over \$50,000, please provide a list of the more costly items or subsets.

Vacuum Vent Valve (5 at \$371)	\$ 1,855.00
Pressure Vent Valve (5 at \$314)	1,570.00
2025 Pump (5 at \$591)	2,955.00
O-Ring Kit (5 at \$120)	600.00
Mass Flow Controller (1 at \$820)	820.00
Computer Board (1 at \$1,825)	1,825.00
Pump Rebuild Kit TEOM (1 at \$155)	155.00
Set of Bypass Filters (2 at \$128)	256.00
O-Ring Package - VSCC (1 at \$32)	32.00
WINS Impactor Oil (4 at \$53)	212.00
WINS Filters (4 at \$40)	160.00
Agilaire Software Maintenance Plan (Updates)	2,315.00
Box of Filter Cassettes (50 each)	1,269.00
Rugged Laptop	3,750.00
e. SUPPLIES TOTAL	\$17,774.00

OBJECT CLASS CATEGORIES WORKSHEET

f. CONTRACTUAL

List <u>each</u> planned contract and the type of services/project activity to be procured. Agreements/contracts with other governmental agencies (state, local or Federal) should be listed under category h. OTHER.	
f. CONTRACTUAL TOTAL	\$0.00

g. CONSTRUCTION

(N/A)

h. OTHER

List other items that would not be appropriately included elsewhere, such as costs for maintenance, operations, repairs, motor pools, rental, training, publication, and printing, and Intergovernmental Agreements	
Filter Analysis and Shipping to Inter-Mountain Laboratories	\$16,500.00
Certification of 2 Chinooks, 2 Delta Cals, 1 Thermometer and 1 TetraCal	1,500.00
Telephone	500.00
Electricity	1,200.00
h. OTHER TOTAL	\$19,700.00

i. TOTAL DIRECT COSTS: (Sum of categories A through H)	\$130,000.00
j. INDIRECT COSTS:	
k. TOTAL PROPOSED COSTS: (Sum of categories I through J)	\$130,000.00
FEDERAL FUNDS REQUESTED: <u>100%</u>	
RECIPIENT SHARE OF TOTAL PROPOSED COSTS: <u>0%</u>	



U.S. ENVIRONMENTAL PROTECTION AGENCY

Washington, DC 20460

KEY CONTACTS FORM

Authorized Representative: *Original awards and amendments will be sent to this individual for review and acceptance, unless otherwise indicated.*

Name: Robert H. Colby

Title: Director

Complete Address: 6125 Preservation Drive, Suite 140

Chattanooga, TN 37416-3740

Phone Number: (423) 643-5999

Payee: *Individual authorized to accept payments.*

Name: James O. Holloway

Title: Operations Manager

Mail Address: 6125 Preservation Drive, Suite 140

Chattanooga, TN 37416-3740

Phone Number: (423) 643-5979

Administrative Contact: *Individual from Sponsored Program Office to contact concerning administrative matters (i.e., indirect cost rate computation, rebudgeting requests etc.)*

Name: James O. Holloway

Title: Operations Manager

Mailing Address: 6125 Preservation Drive, Suite 140

Chattanooga, TN 37416-3740

Phone Number: (423) 643-5979

FAX Number: (423) 643-5972

E-Mail Address: holloway_jim@chattanooga.gov

Principal Investigator: *Individual responsible for the technical completion of the proposed work.*

Name: M. Kathryn Jones

Title: Air Monitoring Manager

Mailing Address: 6125 Preservation Drive, Suite 140

Chattanooga, TN 37416-3740

Phone Number: (423) 643-5980

FAX Number: (423) 643-5972

E-Mail Address: jones_kathy@chattanooga.gov

Web URL: www.apcb.org

The public reporting and recordkeeping burden for this collection of information is estimated to average 30 minutes per response. Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including through the use of automated collection techniques to the Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822T), 1200 Pennsylvania Ave., NW, Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed form to this address.

ASSURANCES - NON-CONSTRUCTION PROGRAMS

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0040), Washington, DC 20503.

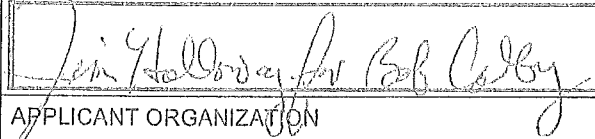
PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.

NOTE: Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the awarding agency. Further, certain Federal awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project cost) to ensure proper planning, management and completion of the project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, through any authorized representative, access to and the right to examine all records, books, papers, or documents related to the award; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
4. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
5. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards for merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
6. Will comply with all Federal statutes relating to nondiscrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681-1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended, relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee- 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and, (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.
7. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal or federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
8. Will comply, as applicable, with provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.

9. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333), regarding labor standards for federally-assisted construction subagreements.
10. Will comply, if applicable, with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
11. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) Implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
12. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
13. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq.).
14. Will comply with P.L. 93-348 regarding the protection of human subjects involved in research, development, and related activities supported by this award of assistance.
15. Will comply with the Laboratory Animal Welfare Act of 1966 (P.L. 89-544, as amended, 7 U.S.C. §§2131 et seq.) pertaining to the care, handling, and treatment of warm blooded animals held for research, teaching, or other activities supported by this award of assistance.
16. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
17. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
18. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
19. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL 	TITLE Director
APPLICANT ORGANIZATION Chattanooga-Hamilton County Air Pollution Control Bureau	DATE SUBMITTED 01/30/2015



U.S. ENVIRONMENTAL PROTECTION AGENCY
Washington, DC 20460

**Preaward Compliance Review Report for
All Applicants and Recipients Requesting EPA Financial Assistance**

Note: Read instructions on other side before completing form.

I. Applicant/Recipient (Name, Address, State, Zip Code). Chattanooga-Hamilton County Air Pollution Control Bureau	DUNS No. 137469552
II. Is the applicant currently receiving EPA assistance? Yes	
III. List all civil rights lawsuits and administrative complaints pending against the applicant/recipient that allege discrimination based on race, color, national origin, sex, age, or disability. (Do not include employment complaints not covered by 40 C.F.R. Parts 5 and 7. See instructions on reverse side.) <p align="center">None</p>	
IV. List all civil rights lawsuits and administrative complaints decided against the applicant/recipient within the last year that allege discrimination based on race, color, national origin, sex, age, or disability and enclose a copy of all decisions. Please describe all corrective action taken. (Do not include employment complaints not covered by 40 C.F.R. Parts 5 and 7. See instructions on reverse side.) <p align="center">None</p>	
V. List all civil rights compliance reviews of the applicant/recipient conducted by any agency within the last two years and enclose a copy of the review and any decisions, orders, or agreements based on the review. Please describe any corrective action taken. (40 C.F.R. § 7.80(c)(3)) <p align="center">None</p>	
VI. Is the applicant requesting EPA assistance for new construction? If no, proceed to VII; if yes, answer (a) and/or (b) below. <div style="display: flex; justify-content: space-between;"> Yes <input checked="" type="checkbox"/> No </div> <p>a. If the grant is for new construction, will all new facilities or alterations to existing facilities be designed and constructed to be readily accessible to and usable by persons with disabilities? If yes, proceed to VII; if no, proceed to VI(b). Yes No</p> <p>b. If the grant is for new construction and the new facilities or alterations to existing facilities will not be readily accessible to and usable by persons with disabilities, explain how a regulatory exception (40 C.F.R. § 7.70) applies. Yes No</p>	
VII. Does the applicant/recipient provide initial and continuing notice that it does not discriminate on the basis of race, color, national origin, sex, age, or disability in its programs or activities? (40 C.F.R. § 5.140 and § 7.95) <input checked="" type="checkbox"/> Yes No <p>a. Do the methods of notice accommodate those with impaired vision or hearing? Yes No</p> <p>b. Is the notice posted in a prominent place in the applicant's offices or facilities or, for education programs and activities, in appropriate periodicals and other written communications? Yes No</p> <p>c. Does the notice identify a designated civil rights coordinator? Yes No</p>	
VIII. Does the applicant/recipient maintain demographic data on the race, color, national origin, sex, age, or handicap of the population it serves? (40 C.F.R. § 7.85(a)) Yes	
IX. Does the applicant/recipient have a policy/procedure for providing access to services for persons with limited English proficiency? (40 C.F.R. Part 7, E.O. 13166) Yes, through City of Chattanooga	
X. If the applicant/recipient is an education program or activity, or has 15 or more employees, has it designated an employee to coordinate its compliance with 40 C.F.R. Parts 5 and 7? Provide the name, title, position, mailing address, e-mail address, fax number, and telephone number of the designated coordinator. Less than 15 employees	
XI. If the applicant/recipient is an education program or activity, or has 15 or more employees, has it adopted grievance procedures that assure the prompt and fair resolution of complaints that allege a violation of 40 C.F.R. Parts 5 and 7? Provide a legal citation or Internet address for, or a copy of, the procedures. Less than 15 employees	
For the Applicant/Recipient	
I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law. I assure that I will fully comply with all applicable civil rights statutes and EPA regulations.	
A. Signature of Authorized Official 	B. Title of Authorized Official Director
C. Date 01/30/2015	
For the U.S. Environmental Protection Agency	
I have reviewed the information provided by the applicant/recipient and hereby certify that the applicant/recipient has submitted all preaward compliance information required by 40 C.F.R. Parts 5 and 7; that based on the information submitted, this application satisfies the preaward provisions of 40 C.F.R. Parts 5 and 7; and that the applicant has given assurance that it will fully comply with all applicable civil rights statutes and EPA regulations.	
A. Signature of Authorized EPA Official See * note on reverse side	B. Title of Authorized EPA Official
C. Date	

Section 103 PM_{2.5} Air Monitoring Work Plan

January 30, 2015

Name of Grantee: Chattanooga Hamilton County Air Pollution Control Bureau

Project Budget Period: April 1, 2015-March 31, 2016

Amount of Funding Requested: \$130,000

Project Objectives and Alignment with EPA Strategic Plan:

The primary objective of this project is to collect quality assured data on ambient air concentrations of fine particulate matter (PM_{2.5}) and its precursors. As described in EPA's PM_{2.5} Monitoring Implementation Plan, dated March 1, 2000, the data will be used for: (1) PM_{2.5} National Ambient Air Quality Standards (NAAQS) comparisons, (2) development and tracking of implementation plans, (3) assessments of regional haze, and (4) assistance for health studies and other ambient aerosol research activities. The PM_{2.5} monitoring network design addresses these four program objectives through a combination of siting and instrumentation strategies.

This project supports EPA's Strategic Plan Goal 1 (Taking Action on Climate Change and Improving Air Quality) and Objective 1.2 (Improve Air Quality), by implementing a variety of monitoring activities that will assist in achieving and maintaining health based air pollution standards to reduce the direct emission of particulate matter and other criteria air pollution from stationary and mobile sources that are protective of human health. The environmental outcome will be reduced incidences of respiratory illnesses including asthma and lung cancer and improved visibility in scenic parks and wilderness areas.

Activities to Be Conducted:

The PM_{2.5} ambient monitoring network will be operated and maintained in accordance with Title 40 of the Code of Federal Regulations (40 CFR), Parts 50, 53, and 58, and published in the *Federal Register* on June 12, 2007. These regulations describe the frequency of sampling and the timely reporting of ambient data to the Air Quality System (AQS) database. The number and types of monitors, as specified in our EPA-approved ambient monitoring plan, which will be operated and maintained, are as follows:

	Method	Monitor	1:1	1:3	1:6
1	2.5 Mass	FRM	--	2	1
2	2.5 Mass	Co-located FRM*	---	1	---
3	2.5 Continuous	FEM	--	--	---
4	2.5 Continuous	Co-located FEM*	---	---	---
5	2.5 Continuous	Non-FEM	---	1	---
6	2.5 Continuous	Co-located Non-FEM	---	--	---
7	Speciation	SASS	--	---	---
8	Speciation	Super-SASS	---	---	---
9	Speciation - Carbon	URG	---	---	---

10	Trace/low	NOx	---	---	---
11	Trace/low	NOy	---	---	---
12	Trace/low	SO ₂	---	---	---
13	Trace/low	CO	---	---	---
14	Meteorological		---	---	---

*Do not double count monitors

As a recipient of an EPA PM_{2.5} monitoring grant, the **Chattanooga Hamilton County Air Pollution Control Bureau** will:

1. Operate and maintain the PM_{2.5} monitoring network in accordance with all EPA requirements.
2. Review and update the quality assurance project plan and standard operating procedures in accordance with Region 4 policies.
3. Submit PM_{2.5} data and associated quality assurance data to AQS with 90 days from the end of the calendar quarter.
4. Comply with guidance in flagging data if it is believed that the data have been affected by an exceptional event.
5. Meet 75% minimum data recovery requirements for the PM_{2.5} network monitors. Report all monitors that do not meet this requirement providing the reason that monitor did not meet the 75% data recovery and the corrective action(s) taken. The report is due to the Region 4 state/local monitoring contact within 30 days of the data being entered into the AQS data base.
6. Submit a PM_{2.5} air monitoring network plan as part of the state's annual air monitoring network plan covering all criteria pollutants. This will be done in coordination with the State, if applicable, by July 1, 2015.
7. Certify calendar year PM_{2.5} FRM data in the State and Local Air Monitoring Station (SLAMS) Annual Report. Submit the annual certification letter and SLAMS Annual Report by May 1, 2015.
8. Air Quality Index (AQI) Forecasting: As resources permit, the grantee agrees to participate in AQI forecasting for those areas with continuous PM_{2.5} monitoring and report all continuous PM_{2.5} data to AQS and to the PM_{2.5} mapping program.
9. Submit the Annual Performance Report that covers the period of January 1 to December 31, 2015 to the EPA Technical Project Officer by January 31, 2016.
10. Demonstrate the quality assurance (QA) competency by:
 - a) Assuring the competency of environmental measurement data collected and generated under the Section 103 PM_{2.5} grant program, as addressed in the quality assurance project plan and standard operating procedures for the PM_{2.5} monitoring network.

- b) Continuing to implement a similar scope of work under this Section 103 PM_{2.5} grant as performed satisfactorily under your previously approved Section 103 PM_{2.5} grants.

Outputs/Milestones:

- Submission of an annual PM_{2.5} air monitoring network plan for EPA approval. This plan is due annually on July 1st as part of the state's annual air monitoring network plan covering all criteria pollutants.
- PM_{2.5} and associated quality assurance data will be submitted into AQS within 90 days after the end of the calendar quarter.

Outcomes:

The anticipated short-term outcome for this project is an increase in the knowledge regarding the character and extent of PM_{2.5} in the ambient air. The long-term outcome, through the eventual development and implementation of your state's implementation plans, is to comply with NAAQSs as set forth in the Clean Air Act.

Budget: The costs associated with this project are detailed in the grant financial application package.

Name: Kathy Jones

Position: Air Monitoring Manager

Agency: Chattanooga Hamilton County Air Pollution Control Bureau